

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

DECLARATION OF THEODORE A. HOWARD

Theodore A. Howard, of the age of majority, hereby declares as follows:

1. I am a member, in good standing and on active status, of the District of Columbia Bar and a partner in the Washington, D.C. law firm of Wiley Rein LLP.

2. I submit this Declaration in support of Plaintiffs' Petition for Award of Enforcement Phase Attorneys' Fees and Costs and supporting Memorandum of Law. Except to the extent otherwise expressly indicated, I have personal knowledge of the matters set forth in this Declaration and, if called upon, believe I would be found competent to testify hereto.

3. In seeking an award of attorneys' fees in the circumstances of a case of this kind, a required element of the applicant's proof involves demonstration to the satisfaction of the Court that the hourly rate charged by the applicant's counsel for which recovery is sought is reasonable in light of counsel's experience, skill and reputation. *See generally Blum v. Stenson*, 465 U.S. 886, 95 n.11 (1984).

4. I graduated from Harvard Law School in 1981 and have been engaged consistently since then in the private practice of law in Washington, DC, concentrating principally on involvement in complex civil litigation matters in federal and state courts, locally

and on a national basis. In addition to my membership in the District of Columbia Bar, I have been admitted to practice before the Supreme Court of the United States, the United States Courts of Appeals for the Fourth, Fifth, Eighth, Ninth, Eleventh and District of Columbia Circuits, the United States Court of Federal Claims and the United States District Court for the District of Columbia.

5. From 1986 through 2014, the principal focus of my practice involved the counseling and representation of international and domestic property/casualty and professional liability insurance companies with respect to complex insurance coverage disputes and related litigation matters. I served as Co-Chair of the American Bar Association, Section of Litigation, Insurance Coverage Litigation Committee (ICLC)'s annual continuing Legal Education Conference, served as one of the Managing Editors of the ICLC's award-winning journal, *Coverage*, and was the Co-Author of a leading two-volume treatise, *The Practitioner's Guide to Litigating Insurance Coverage Actions* (Aspen/Wolters Kluwer Law & Bus. Publications, 2d. ed.). My competency as an insurance practitioner was recognized (at various times) by my inclusion in "Best Lawyers in America," "America's Leading Lawyers for Business" (Chambers Publications), "D.C. Superlawyers" (Law & Politics Publications), and *The International Who's Who in Insurance and Reinsurance*, and I was a Fellow in the American College of Coverage and Extracontractual Counsel.

6. Beginning in 1989, and on a nearly continuous basis since then, a significant part of my legal practice has involved the pro bono representation of incarcerated individuals seeking to challenge the constitutionality of various conditions of confinement through actions brought in the federal courts pursuant to 42 U.S.C. § 1983. In addition to this hands-on-litigation involvement, I served on the Board of Directors of a non-profit legal services organization, the

D.C. Prisoners Legal Services Project, Inc., from 1992 to 2006, including as Chair of that Board from 1995 to 2006. The Prisoners' Project devoted its activities exclusively to public policy advocacy and impact litigation aimed at improving conditions of confinement for individuals incarcerated for conduct in violation of the District of Columbia and/or United States Criminal Codes. Since 2006, following the merger of the DC. Prisoners' Project with the Washington Lawyers' Committee for Civil Rights and Urban Affairs (WLC), I have served on the Board of Directors of the WLC, including a three-year term as Co-Chair of the WLC's Board from 2011 to 2014. As a result of these activities, I believe that I have experience and expertise with respect to pro bono civil rights litigation on behalf of prisoners that compares favorably with that of any other full-time private sector attorney in the District of Columbia, if not nationally.

7. In 2014, the Management Committee of my law firm, Wiley Rein LLP, determined to create a position within the firm for a full-time pro bono practitioner and, at its request, I accepted an appointment to serve in this role. Since the completion of a period of approximately six months following my appointment during which I disengaged from all of my responsibilities for paying client matters in the firm's Insurance Practice, I have devoted all of my time to overseeing and administering the firm's pro bono program, developing and fostering the firm's relationships with the legal services organizations which refer pro bono matters to the firm's lawyers, and maintaining an active docket of pro bono cases ranging from representation of indigent or low-income individuals in the Landlord-Tenant Branch of the D.C. Superior Court to involvement in impact-oriented civil rights litigation such as the instant case.

8. I was recently re-elected to a second three-year term on the Board of Governors of the District of Columbia Bar. I have served, since 2016, on the District of Columbia Circuit Judicial Conference's Standing Committee on Pro Bono Legal Services, a position to which I

was appointed by that Court's Chief Judge, the Hon. Merrick Garland. I have also served, since 2015, on the America Bar Association's Standing Committee on Legal Aid and Indigent Defendants (SCLAID), and was recently reappointed to serve as the Chair of SCLAID for a second one-year term.

9. From the time of Wiley Rein's initial involvement in the instant case in 2008 through February 2016, when this Court issued its Final Judgment Order approving the Parties' Settlement Agreement, I was only one of a team of attorneys at the firm who participated, with our co-counsel at the WLC and the Legal Aid Justice Center (LAJC) in representing the Plaintiffs in the case. However, after the entry of Judgment, the Wiley Rein litigation team dispersed, and I have been the firm's only lawyer having a consistent and significant level of participation in the case thereafter, including the Enforcement Phase, for which Plaintiffs now seek to recover fees.

10. As indicated by the firm's Detailed Billing Record maintained by its Accounting Department for this case, a true and correct copy of which is attached hereto as Exhibit 1, reflecting time charges recorded and expenses incurred for the Enforcement Phase time period chosen by the Plaintiffs for purposes of their Petition commencing January 10, 2017, my standard hourly billable rate for legal services was/is \$775.00 per hour. The reasonableness of this hourly rate within the context of the Washington, DC legal market for practitioners of comparable experience can be measured by reference to the current iterations of the Adjusted *Laffey* Matrix and the U.S. Attorney's Office for the District of Columbia Civil Division's Adjusted Matrix, true and correct copies of which are attached hereto as Exhibits 2 and 3, respectively. Each of these Matrices has been accepted by the federal courts of the District of Columbia as competent evidence admissible for purposes of establishing the prevailing hourly

market rates for Washington, DC attorneys engaged in complex civil litigation practice. *See, e.g., Covington v. District of Columbia*, 839 F. Supp. 894, 900 (D.D.C. 1993), *aff'd*, 57 F.3d 1101, 1109-10 (D.C. Cir. 1995), *cert. denied*, 516 U.S. 1115 (1996).

11. The Adjusted *Laffey* Matrix and the U.S. Attorney's Office Adjusted Matrix establish a range of presumptively-reasonable hourly rates for practitioners of my level of experience (*i.e.*, more than 20 years of experience) in the time period January 10, 2017 to the present from a low figure of \$602.00/hr. (USAO Adj. Mat., 31+ years, 2017-18) to a high of \$894.00/hr. (Adj. *Laffey* Mat., 20+ years, 6/1/18 – 5/31/19). My hourly rate of \$775.00/hr. during the relevant time period falls squarely within the middle of this range and thus would be perceived by District of Columbia courts to be presumptively reasonable.¹ However, given the applicable cap on hourly rates imposed by the PLRA – *see* Plaintiffs' Memorandum at 13-14 – my hours for which Plaintiffs' Petition seeks recovery are subject to a rate of \$220.50.

12. During the Enforcement Phase of this litigation, I devoted substantial hours to representation of the Plaintiffs' interests through my involvement in a variety of activities including:

- serving as the principal draftsman of Plaintiffs' April 20, 2017 Notice Letter to Defendants pursuant to Section IV.2.c. of the Settlement Agreement;
- serving as the principal draftsman of Plaintiffs' Motion for Order to Show Cause Why Defendants Should Not Be Held in Contempt and supporting Memorandum of Law, as well as Plaintiffs' Reply Memorandum in response to the Defendants' Opposition to the Show Cause Motion;
- conferring and collaborating with co-counsel at the LAJC with respect to all aspects of the Plaintiffs planning and execution of their discovery strategy and trial strategy;

¹ In awarding fees to the Plaintiffs for successful prosecution of a motion to compel discovery in the pre-settlement stage of this litigation, this Court rejected the Plaintiffs' "plausible arguments why Washington, D.C. could be used as the relevant market to establish reasonable rates for counsel's services," but held that "[g]iven Mr. Howard's experience and qualifications, he is entitled to at least \$400.00 per hour for his services in [the Western District of Virginia] legal community." *See* ECF Dkt. No. 109 at 9-10 (April 15, 2014).

- participating actively in the performance of all tasks relating to pursuit of Plaintiffs' discovery of Defendants and responding to Defendants' discovery of Plaintiffs, including preparation for and conducting of depositions; meet-and-confer correspondence and telephone conferences with Defendants' counsel in an effort to narrow or resolve disputes; briefing and presentation of argument on disputed matters;
- serving as the principal draftsman of Plaintiffs' Pre-Trial Brief;
- assuming principal responsibility for working with Plaintiffs' expert, Dr. Greifinger, in preparation of his Reports, preparing him for and defending his deposition, and preparing him for and presenting his testimony at trial;
- serving as Plaintiffs' co-lead counsel at Mediation as well as at trial;
- serving as principal draftsman of Plaintiffs' Proposed Conclusions of Law, Post-Trial Brief and Post-Trial Response Brief while actively assisting LAJC co-counsel in the preparation of Plaintiffs' Proposed Findings of Fact; and
- working collaboratively with LAJC co-counsel to provide Plaintiffs' extensive written comments on each draft Report prepared and circulated by Dr. Scharff after each of his monitoring visits at FCCW prior to trial.

13. In total, my hours incurred during the Enforcement Phase on work encompassing the various activities described above, totaled 1154.00.² In the exercise of professional billing judgment of the same sort I would routinely apply in reviewing and editing a bill for submission to one of the firm's paying clients, I have reduced the total hours for which recovery is sought by 161.00 hours, to 993.00, taking into account such considerations as, for example, time devoted to specific issues that Plaintiffs' ultimately chose not to pursue at trial; time devoted to tasks more properly characterized as administrative or clerical in nature; instances in which the time description was inaccurate or insufficiently precise; instances in which the time entry could be subject to challenge as reflecting so-called "block billing," and the like.

² While the Wiley Rein LLP DBR, Exh. 1 hereto, reflects a total of 1,190 hours of my time over the period January 10, 2017 through May 31, 2019, hours associated with time entries for the activities described above totaled 1,154.

14. In addition to my hours, Plaintiffs seek recovery for the hours devoted to their representation in the Enforcement Phase of this case by four additional individuals at Wiley Rein – Legal Assistants Hannah Lynn, Rachel Williams and Elizabeth White, and Litigation Practice Support Specialist Paul Michel – for the assistance they provided to me and to Plaintiffs' litigation team as a whole. Mr. Michel created and managed the electronic database containing all of the documents produced by the Defendants in response to the Plaintiffs' discovery requests as well as the medical and institutional records of the Plaintiffs whose Declarations were filed in support of the Show Cause Motion. He provided training to LAJC co-counsel on how to access and utilize the databases remotely and worked in collaboration with Ms. Lynn and Ms. Williams to perform searches of the databases for particular documents needed to respond to Defendants' discovery requests to Plaintiffs, to assist Plaintiffs' counsel in preparing for depositions of Defendants' fact and expert witnesses, and for use of exhibits to court filings. Ms. Lynn and Ms. Williams also assisted with cite-checking of Plaintiffs' memoranda and briefs as well as with e-filings of submissions to the Court. After Ms. Lynn and Ms. Williams left the Firm, Ms. White stepped in and performed a variety of tasks similar to those performed by her predecessors.

15. Mr. Michel's standard hourly rate as charged by the firm for his services during the Enforcement Phase was \$325.00. Ms. Lynn's rate was \$210.00/hr.; Ms. William's rate was \$205.00/hr.; and Ms. White rate was \$190.00/hr. The Legal Assistants' hourly rates are generally within the range of presumptive reasonableness established by the *Adjust Laffey* Matrix. *See* Exh. 2 (range, for Paralegal/Law Clerk, from \$187.00/hr. in early 2017 to \$202.00/hr. at present). In any event, pursuant to the PLRA, Plaintiffs seek recovery based on a capped rate of \$150.00/hr. for the Wiley Rein support personnel, whose hours totaled 838.50,

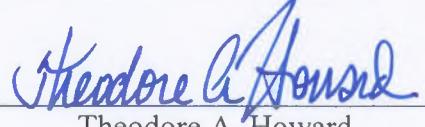
including 386.25 hours for Mr. Michel, 285.00 hours for Ms. Lynn, 118.00 hours for Ms. Williams and 49.25 hours for Ms. White.

16. On the basis of extensive experience over the course of more than 38 years in practice in complex civil litigation matters in Washington, DC, including extensive involvement in civil rights litigation in general and prisoners' conditions cases in particular, I believe that the hours incurred by myself and others at Wiley Rein LLP as referenced above for which recovery is sought by Plaintiffs – which is a small fraction of what the firm has devoted to this case – were reasonably and necessarily incurred in pursuit of the successful result achieved on behalf of the Plaintiffs.

17. As reflected by the firm's Detailed Billing Record (Exh. 1 hereto), the firm incurred litigation-related expenses in the Enforcement Phase totaling \$206,956.34. Deducting from that total the sum of \$122,196.22 attributable to payments for services rendered by the Plaintiffs' experts, Dr. Greifinger and Jackie Clark-Weissman, R.N., as to which recovery is precluded under 42 U.S.C. § 1988, a balance of \$84,760.12 remains. From this amount, a further deduction of \$144.58 for various meals has been made, resulting in a balance of \$84,615.64. Plaintiff seek recovery of this amount as costs reasonably and necessarily incurred in conducting this complex, protracted litigation.

The foregoing matters are true to the best of my personal knowledge, information and belief.

DATED: June 12, 2019



Theodore A. Howard

EXHIBIT 1

Time Report

Billed and Unbilled

Washington Lawyers Committee for Civil / Fluvanna Medical Care Class Action (75459-21)

1/1/02/2017 - 5/31/2019

Attorney	Name	Description	Orig Hrs	Orig Amt	Rev Hrs	Rev Amt	Rev Rate	First	Last
0611	Talanian, Rachel	Project Assistant	4.00	800.00	-	-	-	06/08/2018	06/08/2018
0612	White, Elizabeth	Legal Assistant	49.75	9,470.00	-	-	-	04/12/2018	01/18/2019
0666	Corbin, Bethany	Associate	10.25	5,842.50	-	-	-	02/08/2018	03/22/2018
0712	Conley, Stephen	Law Clerk	19.00	5,605.00	-	-	-	07/03/2018	07/16/2018
0715	Lee, Tawanna	Law Clerk	14.25	4,203.75	-	-	-	07/20/2018	07/27/2018
0730	Hankin, Eden	Project Assistant	3.20	689.00	-	-	-	08/07/2018	01/24/2019
0828	Barondess, Danielle	Associate	8.50	3,357.50	-	-	-	10/12/2017	10/17/2017
1544	Conway, Michael	eDiscovery Specialist	18.45	5,481.25	-	-	-	02/09/2013	01/22/2019
3747	Howard, Theodore	Partner	1,191.00	933,795.00	-	-	-	01/10/2017	05/06/2019
4600	Jasper-Booker, Whekrown	Legal Assistant	4.00	1,100.00	-	-	-	09/05/2017	09/05/2017
5390	Lynn, Hannah	Project Assistant	285.00	59,850.00	-	-	-	06/13/2017	06/08/2018
5693	Michel, Paul	eDiscovery Specialist	386.25	125,531.25	-	-	-	12/18/2017	08/08/2018
8258	Swendsbøe, Krystal	Associate	4.30	2,709.00	-	-	-	01/15/2019	01/23/2019
9406	Williams, Rachel	Legal Assistant	118.00	24,190.00	-	-	-	06/12/2017	04/30/2018
			2,115.95	1,182,624.25	-	-	-		

Cost Report

Billed and Unbilled

Washington Lawyers Committee for Civil / Fluvanna Medical Care Class Action (75459-21)

1/1/02/2017 - 5/31/2019

Service Code	Description	Orig Amt	Rev Amt	First	Last
00050	Client Overpaym./Prepaym	(1,947.30)	(1,947.30)	09/19/2018	09/19/2018
00070	Court Reporters	981.85	981.85	06/27/2018	06/27/2018
00080	Database Res. Service	2,512.89	2,512.89	10/06/2017	03/31/2019
00085	Database Res. Service	2,189.55	2,189.55	09/05/2017	01/23/2019
00090	Depositions/Transcripts	48,551.04	48,551.04	04/17/2018	08/31/2018
00105	Office Copying Service	321.00	321.00	05/08/2017	08/12/2018
00110	Business Meals	12.00	12.00	06/27/2017	06/27/2017
00130	Witness Fees	150.00	150.00	06/25/2018	06/25/2018
00160	EDiscovery Processing/Hosting	160.00	160.00	03/26/2018	06/08/2018
00165	EDiscovery Processing/Hosting	17,333.93	17,333.93	01/31/2018	04/30/2019
00170	Local Courier Service	193.00	193.00	02/15/2018	02/15/2018
00180	Local Transportation	224.61	224.61	06/27/2017	08/21/2018
00210	Miscellaneous	580.79	580.79	04/18/2017	04/18/2017
00220	Overtime Meals	10.67	10.67	05/31/2018	05/31/2018
00230	Overtime Transportation	10.30	10.30	03/22/2018	03/22/2018
00250	Travel - Plane/Train Fare	439.00	439.00	05/10/2018	05/10/2018
00270	Outside Printing & Duplicating	10,413.96	10,413.96	05/17/2017	06/01/2018
00490	Air Delivery	368.76	368.76	05/08/2017	02/21/2019
00630	Consultants	122,196.22	122,196.22	05/31/2017	12/05/2018
00640	Travel - Hotel	1,933.57	1,933.57	05/10/2018	06/19/2018
00650	Travel - Meals	121.91	121.91	06/19/2018	06/19/2018
00690	Travel - All Other Exp.	198.59	198.59	05/10/2018	07/31/2018
		206,956.34	206,956.34		

Time Report
 Billed and Unbilled
 Washington Lawyers Committee for Civil / Fluvaria Medical Care Class Action (75459.21)

Date	SMT Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice Status	Narrative	Posted
		Truman, Rachel	Total		4.00	800.00		4.00	0.00						
		White, Elizabeth	Total		49.75	9,470.00		49.75	0.00						
		Corbin, Bethany	Total		10.25	5,842.50		10.25	0.00						
		Conley, Stephen	Total		19.00	5,805.00		19.00	0.00						
		Lee, Tawanna	Total		14.25	4,203.75		14.25	0.00						
		Hankin, Eden	Total		3.20	689.00		3.20	0.00						
		Barondess, Danielle	Total		8.50	3,357.50		8.50	0.00						
		Conway, Michael	Total		18.45	5,481.25		18.45	0.00						
		Howard, Theodore	Total												
		Jasper-Booker, Whetstone	Total		1,191.00	933,795.00		1,191.00	0.00						
			Total		4.00	1,100.00		4.00	0.00						
		Lynn, Hannah	Total		285.00	59,850.00		285.00	0.00						
		Michel, Paul	Total		386.25	125,531.25		386.25	0.00						
		Swordsbee, Krystal	Total		4.30	2,079.00		4.30	0.00						
		Williams, Rachel	Total		118.00	24,190.00		118.00	0.00						
		Grand Total			2,115.95	1,182,624.25		2,115.95	0.00						

Time Report
 Billed and Unbilled
 Washington Lawyers Committee for Civil / Fluvaria Medical Care Class Action (75459.21)

Date	SMT	Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice Status	Narrative	Posted	
06/08/2018	0611	Talanian, Rachel	Total	20410	Project Assistant	0	4.00	800.00	200.00	4.00	0.00	0.00	0.00 08000	0	Unbilled	Lynn re case and next steps (1).	6/2018
04/13/2018	0612	White, Elizabeth		20410	Project Assistant	0	2.75	522.50	190.00	2.75	0.00	0.00	0.00 08000	0	Unbilled	Review documents for privileged material and sort responsive documents in preparation for production of materials	4/2018
04/13/2018	0612	White, Elizabeth		20410	Project Assistant	0	6.50	1,235.00	190.00	6.50	0.00	0.00	0.00 08000	0	Unbilled	Create log of privileged materials withheld from production for opposing counsels use	4/2018
05/01/2018	0612	White, Elizabeth		20410	Project Assistant	0	3.75	712.50	190.00	3.75	0.00	0.00	0.00 08000	0	Unbilled	Review documents to file production of documents	5/2018
06/11/2018	0612	White, Elizabeth		20410	Project Assistant	0	0.25	47.50	190.00	0.25	0.00	0.00	0.00 08000	0	Unbilled	Review documents to file production of documents	6/2018
06/19/2018	0612	White, Elizabeth		20410	Project Assistant	0	0.25	47.50	190.00	0.25	0.00	0.00	0.00 08000	0	Unbilled	Correspond with Ms. Ellis regarding medical records not yet received	6/2018
06/25/2018	0612	White, Elizabeth		20410	Project Assistant	0	0.50	95.00	190.00	0.50	0.00	0.00	0.00 08000	0	Unbilled	Correspond with Vicki Collins at VDOC to locate ordered medical records	6/2018
07/31/2018	0612	White, Elizabeth		20210	Legal Assistant	0	3.75	712.50	190.00	3.75	0.00	0.00	0.00 08000	0	Unbilled	Search for files of exhibits to pretrial brief at the request of Mr. Howard	6/2018
08/01/2018	0612	White, Elizabeth		20210	Legal Assistant	0	5.75	1,092.50	190.00	5.75	0.00	0.00	0.00 08000	0	Unbilled	Conference call with Ms. and Ms. Simmons to determine division of labor and review (0.75); review finding of facts to ensure accuracy and uniformity of citations (3)	7/2018
08/05/2018	0612	White, Elizabeth		20210	Legal Assistant	0	4.75	902.50	190.00	4.75	0.00	0.00	0.00 08000	0	Unbilled	Review and revise citations in Findings of Fact for accuracy and consistency	8/2018
08/06/2018	0612	White, Elizabeth		20210	Legal Assistant	0	7.00	1,330.00	190.00	7.00	0.00	0.00	0.00 08000	0	Unbilled	Review citations in Findings of Fact for accuracy and consistency	8/2018
08/07/2018	0612	White, Elizabeth		20210	Legal Assistant	0	5.50	1,045.00	190.00	5.50	0.00	0.00	0.00 08000	0	Unbilled	Post-Trial Brief, prepare for filing, and file documents	8/2018
08/08/2018	0612	White, Elizabeth		20210	Legal Assistant	0	7.00	1,330.00	190.00	7.00	0.00	0.00	0.00 08000	0	Unbilled	Prepare courtesy copy of Findings of Fact, Conclusions of Law, and Post-Trial Brief, including trial exhibits, to send to Judge Moon; prepare case notebook of cases cited in Defendants' Brief	8/2018
01/18/2019	0612	White, Elizabeth		20210	Legal Assistant	0	0.50	95.00	190.00	0.50	0.00	0.00	0.00 08000	0	Billed	File motion for extension of time and supporting memorandum of law	1/2019
01/18/2019	0612	White, Elizabeth		20210	Legal Assistant	0	0.50	112.50	225.00	0.50	0.00	0.00	0.00 08000	0	Unbilled	File motion for extension of time and supporting memorandum of law	2/2019
01/18/2019	0612	White, Elizabeth		20210	Legal Assistant	0	-0.50	-95.00	190.00	-0.50	0.00	0.00	0.00 08000	0	Billed	File motion for extension of time and supporting memorandum of law	2/2019
02/08/2018	0612	White, Elizabeth	Total				49.75	9,470.00		49.75	0.00						
02/14/2018	0666	Corbin, Bethany	10110	Associate		0	3.00	1,710.00	570.00	3.00	0.00	0.00	0.00 08000	0	Unbilled	Review and analyze (1) background information and case history regarding the Fluvaria Correctional Center for Women class action lawsuit, including the pre-trial order, summary judgment decisions and settlement agreement, and (2) plaintiffs' requests for production of documents and meet and confer letter.	2/2018
02/14/2018	0666	Corbin, Bethany	10110	Associate		0	1.25	712.50	570.00	1.25	0.00	0.00	0.00 08000	0	Unbilled	Outline motion to compel document production, focusing particularly on the deficiencies in the document production offered to date and the insufficiency of the general objections.	2/2018
02/18/2018	0666	Corbin, Bethany	10110	Associate		0	1.00	570.00	570.00	1.00	0.00	0.00	0.00 08000	0	Unbilled	Outline motion to compel document production, focusing particularly on the deficiencies in the document production offered to date and the insufficiency of the general objections.	2/2018
02/23/2018	0666	Corbin, Bethany	10110	Associate		0	1.00	570.00	570.00	1.00	0.00	0.00	0.00 08000	0	Unbilled	Draft motion to compel discovery responses.	2/2018
02/27/2018	0666	Corbin, Bethany	10110	Associate		0	0.50	285.00	570.00	0.50	0.00	0.00	0.00 08000	0	Unbilled	Attend meet and confer regarding failure to timely produce discovery responses to client's discovery requests.	2/2018
03/20/2018	0666	Corbin, Bethany	10110	Associate		0	1.50	855.00	570.00	1.50	0.00	0.00	0.00 08000	0	Unbilled	Review and analyze case law requiring a party that asserts overbreadth or undue burden as grounds for avoiding discovery to support such assertions with concrete and factual representations rather than mere conclusory allegations.	3/2018
03/22/2018	0666	Corbin, Bethany	10110	Associate		0	2.00	1,140.00	570.00	2.00	0.00	0.00	0.00 08000	0	Unbilled	Research whether injunctive relief for a civil contempt show cause motion is assessed at the motion stage or at the hearing stage.	3/2018
07/03/2018	0712	Conley, Stephen	10210	Law Clerk		0	1.50	442.50	295.00	1.50	0.00	0.00	0.00 08000	0	Unbilled	Research whether injunctive relief for a civil contempt action is assessed at the show cause motion stage or at the hearing stage.	7/2018
07/05/2018	0712	Conley, Stephen	10210	Law Clerk		0	2.00	590.00	295.00	2.00	0.00	0.00	0.00 08000	0	Unbilled	Research whether injunctive relief for a civil contempt action is assessed at the show cause motion stage or at the hearing stage.	7/2018

Date	SM Task	Attorney	Name	Staff Level	Description	Rate	O/Hrs	O/Hr Amt	O/Hr Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
07/06/2018		0712	Conley, Stephen	10210	Law Clerk	0	0.50	147.50	295.00	0.50	0.00	0.00	08000	0	0	Unbilled	Researched whether injunctive relief in a civil contempt hearing is assessed at the motion to show cause stage or at the show cause hearing.	7/2018
07/06/2018		0712	Conley, Stephen	10210	Law Clerk	0	2.50	737.50	295.00	2.50	0.00	0.00	08000	0	0	Unbilled	Researched whether injunctive relief in a civil contempt hearing is assessed at the motion stage or at the show cause hearing.	7/2018
07/06/2018		0712	Conley, Stephen	10210	Law Clerk	0	1.50	442.50	295.00	1.50	0.00	0.00	08000	0	0	Unbilled	Researched whether injunctive relief in a civil contempt hearing is the motion to show cause or at the show cause hearing.	7/2018
07/06/2018		0712	Conley, Stephen	10210	Law Clerk	0	1.00	295.00	295.00	1.00	0.00	0.00	08000	0	0	Unbilled	Researched whether injunctive relief in a civil contempt hearing is the motion to show cause or at the show cause hearing in a civil contempt action.	7/2018
07/09/2018		0712	Conley, Stephen	10210	Law Clerk	0	1.00	295.00	295.00	1.00	0.00	0.00	08000	0	0	Unbilled	Researched whether injunctive relief in a civil contempt hearing is assessed at the motion to show cause or at the show cause hearing.	7/2018
07/09/2018		0712	Conley, Stephen	10210	Law Clerk	0	0.50	147.50	295.00	0.50	0.00	0.00	08000	0	0	Unbilled	Consulted Ted Howard on injunctive relief research for civil contempt proceedings.	7/2018
07/09/2018		0712	Conley, Stephen	10210	Law Clerk	0	0.50	147.50	295.00	0.50	0.00	0.00	08000	0	0	Unbilled	Researched whether injunctive relief in a civil contempt hearing is assessed at the motion to show cause or at the show cause hearing.	7/2018
07/13/2018		0712	Conley, Stephen	10210	Law Clerk	0	0.75	221.25	295.00	0.75	0.00	0.00	08000	0	0	Unbilled	Researched whether injunctive relief for civil contempt is assessed at the show cause motion stage or at the civil contempt hearing.	7/2018
07/14/2018		0712	Conley, Stephen	10210	Law Clerk	0	3.00	885.00	295.00	3.00	0.00	0.00	08000	0	0	Unbilled	Researched whether injunctive relief for civil contempt is assessed as of the show cause motion or as of the civil contempt hearing.	7/2018
07/15/2018		0712	Conley, Stephen	10210	Law Clerk	0	3.00	885.00	295.00	3.00	0.00	0.00	08000	0	0	Unbilled	Researched whether injunctive relief for civil contempt is assessed at the show cause motion stage or at the civil contempt hearing.	7/2018
07/16/2018		0712	Conley, Stephen	10210	Law Clerk	0	1.25	368.75	295.00	1.25	0.00	0.00	08000	0	0	Unbilled	Researched whether injunctive relief for civil contempt is assessed at the show cause motion stage or as of the show cause hearing.	7/2018
07/20/2018		0715	Conley, Stephen	10210	Law Clerk	0	0.25	73.75	295.00	0.25	0.00	0.00	08000	0	0	Unbilled	Conference with T. Howard re pro-bono project regarding the scope of immunity protections.	7/2018
07/20/2018		0715	Lee, Tawanna	10210	Law Clerk	0	19.00	5,605.00	19.00	0.00	0.00	0.00	08000	0	0	Unbilled	Review and analyze background information for pro-bono project.	7/2018
07/23/2018		0715	Lee, Tawanna	10210	Law Clerk	0	2.00	590.00	295.00	2.00	0.00	0.00	08000	0	0	Unbilled	Conduct legal research for pro-bono project regarding scope of immunity protections.	7/2018
07/24/2018		0715	Lee, Tawanna	10210	Law Clerk	0	4.50	1,327.50	295.00	4.50	0.00	0.00	08000	0	0	Unbilled	Conduct legal research for pro-bono project regarding scope of immunity protections.	7/2018
07/25/2018		0715	Lee, Tawanna	10210	Law Clerk	0	1.50	442.50	295.00	1.50	0.00	0.00	08000	0	0	Unbilled	Draft legal memorandum for pro-bono project regarding scope of immunity protections.	7/2018
07/26/2018		0715	Lee, Tawanna	10210	Law Clerk	0	2.50	737.50	295.00	2.50	0.00	0.00	08000	0	0	Unbilled	Update and revise findings in legal memorandum for pro-bono project regarding scope of immunity protections.	7/2018
07/27/2018		0715	Lee, Tawanna	10210	Law Clerk	0	0.50	147.50	295.00	0.50	0.00	0.00	08000	0	0	Unbilled	Update and revise findings in legal memorandum for pro-bono project regarding scope of immunity protections.	7/2018
			Lee, Tawanna		Total		14.25	4,203.75	14.25	0.00	0.00	0.00	0	0	Unbilled	At the request of Mr. Howard, print and organize approximately 40 exhibits to send as courtesy copies after the filing of the post-trial brief in the Fluvanna case.	8/2018	
08/07/2018		0730	Hankin, Eden	20410	Project Assistant	0	2.50	537.50	215.00	2.50	0.00	0.00	08000	0	0	Unbilled	At the request of Mr. Howard, organize copies of the cases cited in the Defendants' Brief for an indexed binder.	8/2018
08/08/2018		0730	Hankin, Eden	20410	Project Assistant	0	0.50	107.50	215.00	0.50	0.00	0.00	08000	0	0	Unbilled	At the request of Ms. Swendeborg, pull cases and treatises from Westlaw.	8/2018
01/24/2019		0730	Hankin, Eden	20410	Project Assistant	0	0.20	44.00	220.00	0.20	0.00	0.00	08000	0	0	Unbilled	Review and analyze motion for order to show cause; Discuss assignment with Ted Howard.	1/2019
10/12/2017		0828	Barondess, Danielle	10110	Associate	0	0.75	295.00	0.75	0.00	0.00	08000	0	0	Unbilled	Review and analyze motion for order to show cause; Discuss assignment with Ted Howard.	10/2017	
10/13/2017		0828	Barondess, Danielle	10110	Associate	0	3.00	1,185.00	395.00	3.00	0.00	0.00	08000	0	0	Unbilled	Review and analyze motion for order to show cause; Research case law in the Fourth Circuit regarding threshold standard for motion for order to show cause and effect on an order to show cause on the burden of proof in contempt hearing.	10/2017
10/16/2017		0828	Barondess, Danielle	10110	Associate	0	2.50	987.50	395.00	2.50	0.00	0.00	08000	0	0	Unbilled	Research case law and draft email: write-up addressing threshold standard for motion for order to show cause and effect on an order to show cause on the burden of proof in contempt hearing.	10/2017
10/17/2017		0828	Barondess, Danielle	10110	Associate	0	2.25	888.75	395.00	2.25	0.00	0.00	08000	0	0	Unbilled	Prepare opposing counsel production for addition to document workspace for legal team reference Mr. T. Howard.	10/2017
02/09/2018		1544	Conway, Michael	20710	ediscovery Specialist	0	0.50	147.50	295.00	0.50	0.00	0.00	08000	0	0	Unbilled	Prepare opposing counsel production for addition to document workspace for legal team reference Mr. T. Howard.	2/2018
03/26/2018		1544	Conway, Michael	20710	ediscovery Specialist	0	2.00	590.00	295.00	2.00	0.00	0.00	08000	0	0	Unbilled	Prepare opposing counsel production for addition to document workspace per Mr. Howard.	3/2018

Time Report
 Billed and Unbilled
 Washington Lawyers Committee for Civil / Fluvaria Medical Care Class Action (75459-21)

Date	SM/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
03/27/2018	1544	Conway, Michael	20710	eDiscovery Specialist	0	0.50	147.50	295.00	0.50	0.00	0.00	08000	0	Unbilled	Prepare bad files for third party data to be import to document.	3/2018	
04/02/2018	1544	Conway, Michael	20710	eDiscovery Specialist	0	1.50	442.50	295.00	1.50	0.00	0.00	08000	0	Unbilled	Prepare import of images from third party production to document workspace for legal team reference.	4/2018	
04/09/2018	1544	Conway, Michael	20710	eDiscovery Specialist	0	1.50	442.50	295.00	1.50	0.00	0.00	08000	0	Unbilled	Prepare third party production for import to document management database for legal team reference per Mr. Howard.	4/2018	
04/10/2018	1544	Conway, Michael	20710	eDiscovery Specialist	0	1.75	516.25	295.00	1.75	0.00	0.00	08000	0	Unbilled	Prepare third party production for import to document management database for legal team reference per Mr. Howard.	4/2018	
04/16/2018	1544	Conway, Michael	20710	eDiscovery Specialist	0	2.50	737.50	295.00	2.50	0.00	0.00	08000	0	Unbilled	Prepare third party production volume SDT004 for addition to document workspace for legal team reference per Mr. Howard.	4/2018	
04/25/2018	1544	Conway, Michael	20710	eDiscovery Specialist	0	1.75	516.25	295.00	1.75	0.00	0.00	08000	0	Unbilled	Add third party production to document workspace for legal team reference per Mr. Howard.	4/2018	
05/09/2018	1544	Conway, Michael	20710	eDiscovery Specialist	0	1.50	442.50	295.00	1.50	0.00	0.00	08000	0	Unbilled	Prepare PDF production records for import to document workspace for legal team reference per Mr. Howard.	5/2018	
05/18/2018	1544	Conway, Michael	20710	eDiscovery Specialist	0	1.00	295.00	295.00	1.00	0.00	0.00	08000	0	Unbilled	Prepare opposing counsel production volume for import to document workspace for legal team reference per Mr. Howard.	5/2018	
05/21/2018	1544	Conway, Michael	20710	eDiscovery Specialist	0	1.00	295.00	295.00	1.00	0.00	0.00	08000	0	Unbilled	Import opposing counsel production volume to document workspace for legal team reference per Mr. Howard.	5/2018	
05/31/2018	1544	Conway, Michael	20710	eDiscovery Specialist	0	1.00	295.00	295.00	1.00	0.00	0.00	08000	0	Unbilled	Prepare two third party production volumes for addition to document workspace for legal team reference per Mr. Howard.	6/2018	
06/06/2018	1544	Conway, Michael	20710	eDiscovery Specialist	0	0.75	221.25	295.00	0.75	0.00	0.00	08000	0	Unbilled	Prepare third party production data for addition to document workspace for legal team reference per Mr. Howard.	6/2018	
06/13/2018	1544	Conway, Michael	20710	eDiscovery Specialist	0	0.50	147.50	295.00	0.50	0.00	0.00	08000	0	Unbilled	Prepare addition of opposing counsel production to document workspace per Mr. Howard.	6/2018	
01/22/2019	1544	Conway, Michael	20710	eDiscovery Specialist	0	0.70	245.00	350.00	0.70	0.00	0.00	08000	0	Unbilled	Prepare index of opposing productions and provide to legal team per Mr. Howard.	1/2019	
01/10/2017	3247	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000	0	Unbilled	Receipt and preliminary review of Compliance Monitor N. Scharff, M.D.'s final Report regarding October 2016 monitoring visit to FCCW, draft transmittal e-mail to co-counsel regarding same and draft e-memo to Dr. Scharff regarding same (1.50). Continue review and integration of comments from co-counsel and editing of and revisions to VDOC Operating Procedure 801.3 concerning ADA compliance (2.50).	1/2017	
01/11/2017	3247	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Receipt and initial review of draft of letter to VDOC posing requests for documents relating to implementation and enforcement of Settlement Agreement and e-mail communications with co-counsel R. Deane of LAC regarding same (1.00); continued work on editing of and revisions to VDOC Operating Procedure 801.3 concerning ADA compliance (2.00).	1/2017	
01/12/2017	3247	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Review and analysis of Compliance Monitor N. Scharff's final Report regarding October 2016 monitoring visit to FCCW and e-mail communications with co-counsel and telephone conference with plaintiffs' medical expert/consultant R. Greifenhagen, M.D., regarding same (2.00); continued editing of and revisions to Plaintiffs' alternative draft of VDOC Operating Procedure 801.3 concerning ADA compliance.	1/2017	
01/13/2017	3247	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000	0	Unbilled	Continued editing of and revisions to Plaintiffs' alternative draft of VDOC Operating Procedure 801.3 concerning ADA compliance.	1/2017	
01/15/2017	3247	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000	0	Unbilled	Completed editing of and revisions to Plaintiffs' alternative draft of VDOC Operating Procedure 801.3 concerning ADA compliance.	1/2017	
01/17/2017	3247	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Review and analysis of final Report of Compliance Monitor N. Scharff, M.D., with respect to October 2016 monitoring visit to FCCW and drafting of e-memo to Dr. Scharff to express concerns regarding Report's lack of responsiveness to Plaintiffs' comments on initial draft of same.	1/2017	
01/18/2017	3247	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Completion and transmission of e-memo to Compliance Monitor N. Scharff regarding concerns with respect to substance of final Report for October 2016 monitoring visit to FCCW (1.50); e-mail communications with co-counsel A. Cofit of Legal Aid Justice Center regarding 8th Amendment implications of pending Virginia State legislative proposal purporting to absolve local jails of responsibility to provide medical care to individuals with pre-existing medical conditions at the time of incarceration (.50).	1/2017	

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs.	Orig Amt	Orig Rate	Rev Hrs.	Rev Amt	Rev Rate	Service Activity	Invoice Status	Narrative	Posted	
01/19/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00 08000	0	Unbilled	E-correspondence with Compliance Monitor N. Scharff, M.D., regarding pending monitoring issues and follow-up with co-counsel regarding same.	1/2017
01/20/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00 08000	0	Unbilled	Participation in conference call of Plaintiffs' Litigation Team to discuss status of Settlement Agreement implementation and enforcement issues, and proposed next steps.	1/2017
01/24/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00 08000	0	Unbilled	Review of revised draft of Plaintiffs' proposed VDOC Operating Procedure 801.3 regarding Americans with Disability Act compliance and final edits and corrections to same.	1/2017
01/26/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00 08000	0	Unbilled	Final review of Plaintiff's alternative draft of VDOC Operating Procedure 801.3 and transmittal of same to VDOC counsel R. Vorhis for review and comment.	1/2017
01/27/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00 08000	0	Unbilled	Procedure 801.3 and transmittal of same to VDOC counsel R. Vorhis for review and comment.	1/2017
01/31/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00 08000	0	Unbilled	Review of draft letter from co-counsel A. Turner of Legal Aid Justice Ctr. to VDOC counsel R. Vorhis regarding request for meeting with VDOC administrators at FCCW to discuss impending release of seriously ill prisoners and e-mail communications with A. Turner regarding same and related matters (1.00); telephone conference with co-counsel E. Mincberg of VMC regarding current status and anticipate nature and extent of VMC's involvement in case going forward (.50).	1/2017
02/13/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00 08000	0	Unbilled	E-mail communications with co-counsel regarding Settlement Agreement implementation and enforcement matters and related issues.	2/2017
02/15/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00 08000	0	Unbilled	Initial review and editing of first draft of Memorandum in Support of Motion for Contempt against VDOC Defendants for violation of Settlement Agreement.	2/2017
02/16/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00 08000	0	Unbilled	Telephone conference with co-counsel A. Turner of LAJC regarding current status (.50); editing of and revisions to draft document request letter to VDOC pursuant to Settlement Agreement document production provisions and transmittal e-mail to co-counsel regarding same (2.50).	2/2017
02/17/2017		3747	Howard, Theodore	10010	Partner	0	8.00	6,200.00	775.00	8.00	0.00	0.00 08000	0	Unbilled	Review of agenda and various attached case materials in preparation for Litigation Team meeting scheduled for 2/17/2017.	2/2017
02/20/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00 08000	0	Unbilled	Preparation for and participation in meeting of Plaintiffs' Litigation Team to discuss strategies for moving forward with Settlement Agreement enforcement action and travel time from home to Charlottesville, VA and return.	2/2017
02/21/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00 08000	0	Unbilled	Editing of and revisions to draft letter to VDOC providing notice as to violations of its obligations under the Settlement Agreement (1.50); initial review of draft of Dr. Scharff's Report based on his January 2017 monitoring visit to FCCW and transmittal e-mail to co-counsel regarding same (.100).	2/2017
02/22/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00 08000	0	Unbilled	Continued review of draft Notice Letter to VDOC in light of Dr. Scharff's current draft Report based on 2017 monitoring visit to FCCW and e-mail and telephone communications with co-counsel regarding same (1.50); final editing of and revisions to Plaintiff's Report Request Letter to VDOC and transmittal e-mail to VDOC counsel R. Vorhis regarding same (1.50).	2/2017
02/23/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00 08000	0	Unbilled	Telephone conference with co-counsel A. Turner regarding status in light of Compliance Monitor's release of draft of Report regarding Jan. 2017 monitoring visit to FCCW.	3/2017
02/28/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00 08000	0	Unbilled	Participation in weekly check-in call of Plaintiff's Litigation team.	3/2017
03/02/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00 08000	0	Unbilled	Review of draft letter to VDOC counsel R. Vorhis and e-mail communications with co-counsel A. Ciofini regarding same.	3/2017
03/07/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00 08000	0	Unbilled	E-mail communications with co-counsel at Legal Aid Justice Center regarding concerns arising in connection with latest reports of inadequate care and treatment of clients at FCCW and strategies for responding to same.	3/2017
03/08/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00 08000	0	Unbilled	Participation in weekly "check-in" call of Plaintiff's Litigation team regarding Settlement Agreement implementation and enforcement issues.	3/2017
03/09/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00 08000	0	Unbilled	E-mail communications with co-counsel and with counsel for the VDOC, R. Vorhis, regarding pending Settlement Agreement implementation and enforcement issues.	3/2017
03/13/2017		3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00 08000	0	Unbilled	Preparation of draft of Plaintiff's consolidated comments regarding draft of Plaintiff-appointed Compliance Monitor N. Scharff concerning January 2017 monitoring visit to FCCW, and e-mail communications with Dr. Scharff and co-counsel A. Turner regarding same.	3/2017

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs.	Orig Amt	Orig Rate	Rev Hrs.	Rev Amt	Rev Rate	Service Activity	Invoice	Status	Narrative	Posted
03/14/2017	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000	0	Unbilled	Participation in weekly "check-in" call of Plaintiffs' litigation team regarding status of various tasks relating to Settlement Agreement implementation and enforcement.	3/2017
03/15/2017	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Final editing of and revisions to Plaintiffs' consolidated comments to current draft Report of Court-appointed Compliance Monitor N Schaff, M.D., and transmission of same to Dr. Schaff.	3/2017
03/17/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Telephone conference with Court-appointed Compliance Monitor N Schaff, M.D., regarding substance and merits of Plaintiffs' consolidated comments to current draft Monitoring Report and email communications with co-counsel regarding same.	3/2017
03/21/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Participation in weekly "check-in" call of Plaintiffs' litigation Team re Settlement Agreement implementation and enforcement issues.	3/2017
03/27/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Operating procedure and draft e-memo to co-counsel regarding same.	3/2017
03/28/2017	3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000	0	Unbilled	Editing of and revisions to draft of Notice Letter to VDOC concerning alleged breaches of obligations under the Settlement Agreement (2.50); participation in weekly "check-in" call of Plaintiffs' litigation Team regarding Settlement Agreement implementation and enforcement matters (1.00); telephone and email communications with J. King of IT Dept regarding Fluviana Extrane Site access issues (.50)).	3/2017
03/29/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Continued editing of and revisions to VDOC Notice letter regarding breach of Settlement Agreement, and editing of and revisions to draft Demand Letter concerning treatment of FCCW prisoner V. Anselme and email communications with co-counsel regarding same.	3/2017
03/31/2017	3747	Howard, Theodore	10010	Partner	0	8.00	6,200.00	775.00	8.00	0.00	0.00	08000	0	Unbilled	Preparation for and participation in meeting of Plaintiffs' litigation Team at Legal Aid Justice Center in Charlottesville, VA to discuss Settlement Agreement strategies and travel from home to Charlottesville and return travel.	3/2017
04/04/2017	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Review of LAC payment records regarding copying of medical records for selected FCCW prisoners and submission of invoices to Accounting or reimbursement of copying costs (.50); preparation for and participation in weekly "check-in" call of plaintiffs' litigation team.	4/2017
04/06/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Review of LAC payment records regarding copying of medical records for selected FCCW prisoners and submission of invoices to Accounting or reimbursement of copying costs (.50); preparation for and participation in weekly "check-in" call of plaintiffs' litigation team.	4/2017
04/11/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Review of co-counsel A. Turner's suggested revisions to draft of Notice Letter to VDOC regarding Settlement Agreement enforcement and telephone and email communications with A. Turner regarding same.	4/2017
04/12/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Preparation for and participation in weekly "check in" call of plaintiffs' litigation team regarding Settlement Agreement enforcement issues and strategy.	4/2017
04/13/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Revisions to draft letter to VDOC regarding improper limitations on scope of access to clients for purposes of legal visits to FCCW.	4/2017
04/14/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding FCCW legal visit access issues (.70); email communications with VDOC counsel R. Vornis regarding proposed revisions to VDOC's Operating Procedures for FCCW (.30).	4/2017
04/15/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Continued editing of and revisions to draft Notice Letter to VDOC concerning intent to initiate contempt proceedings in light of ongoing breaches or obligations under Settlement Agreement and email communications with co-counsel A. Turner regarding same.	4/2017
04/17/2017	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Continued and completed edits to Notice Letter to VDOC regarding prospective contempt proceeding for breach of Settlement Agreement.	4/2017
04/17/2017	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Continued work on editing of and revisions to draft Notice Letter to VDOC detailing matters in regard to which it is in breach of Settlement Agreement and email communications with medical consultant R. Grefeinger, M.D., regarding same.	4/2017

Date	SMT/Task	Attorney Name	Staff Level Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice Status	Narrative	Posted	
04/18/2017	3747	Howard, Theodore	10010 Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Continued work on editing of and revisions to draft Notice Letter to VDOC and email communications with co-counsel and telephone conference with medical consultant R. Greifinger; M.D., S. Vandeman and draft email report to co-counsel regarding same (1.00); review and analysis of documents received from VDOC/FCCW regarding death of FCCW prisoner (1.00); final editing of and revisions to Notice Letter to VDOC regarding breaches of Settlement Agreement (1.00); implementation and enforcement matters (1.00).	4/2017
04/19/2017	3747	Howard, Theodore	10010 Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Editing of and revisions to draft Notice Letter to VDOC regarding breaches of Settlement Agreement and transmit to co-counsel for final review and comment.	4/2017
04/20/2017	3747	Howard, Theodore	10010 Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Review of draft letter to VDOC expressing concerns over treatment of Type-1 diabetes of FCCW prisoner T. Glimer and email communications with co-counsel R. Deane regarding same (1.00); final editing of and revisions to Notice Letter to VDOC regarding breaches of Settlement Agreement and transmit to co-counsel for final review and comment.	4/2017
04/21/2017	3747	Howard, Theodore	10010 Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Review of list of issues of current concern prepared by co-counsel A. Turner for submission to Compliance Monitor N. Scharff, M.D., in anticipation of 4/24/2017 monitoring visit to FCCW and email communications with co-counsel regarding same.	4/2017
04/25/2017	3747	Howard, Theodore	10010 Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Email communications with co-counsel at LAJC regarding pending matters of concern.	4/2017
04/28/2017	3747	Howard, Theodore	10010 Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Email communications with co-counsel letters to VDOC concerning deficient medical care.	4/2017
05/01/2017	3747	Howard, Theodore	10010 Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Email communications with co-counsel regarding general status of FCCW resident V. Anselme, etc.	5/2017
05/02/2017	3747	Howard, Theodore	10010 Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Participation in weekly check-in call of Plaintiffs' Litigation Team.	5/2017
05/03/2017	3747	Howard, Theodore	10010 Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Telephone conference with co-counsel B. Casaneda and A. Cioffi of Legal Aid Justice Center regarding upcoming briefing of Motion for Contempt focused on VDOC's breaches of Settlement Agreement.	5/2017
05/10/2017	3747	Howard, Theodore	10010 Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Telephone conf. with P. Formaci of WLC Prisoners' Project regarding current status.	5/2017
05/15/2017	3747	Howard, Theodore	10010 Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Review of email communications from co-counsel regarding status of various deficient medical care problems and concern regarding and inadequate capacity for attorney visits at FCCW.	5/2017
05/16/2017	3747	Howard, Theodore	10010 Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Participation in weekly "check-in" status telephone conference of all Plaintiffs' counsel.	5/2017
05/23/2017	3747	Howard, Theodore	10010 Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Review and analysis of case file materials in preparation for in-person meeting of Plaintiffs' Litigation Team, including VDOC letter in response to Plaintiffs' Notice Letter concerning breaches of Settlement Agreement.	5/2017
05/24/2017	3747	Howard, Theodore	10010 Partner	0	8.50	6,587.50	775.00	8.50	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Attendance and participation in meeting of Plaintiffs' Litigation Team at Legal Aid Justice Center in Charlottesville (or same and travel time from home to Charlottesville for same and return travel).	5/2017
05/26/2017	3747	Howard, Theodore	10010 Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Email communications with co-counsel regarding pending Settlement Agreement enforcement matters and emergent medical care issues at FCCW.	5/2017
05/29/2017	3747	Howard, Theodore	10010 Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Email communications with co-counsel regarding receipt and transmission of draft report from compliance monitor N. Scharff, M.D., summarizing 4/2017 monitoring visit to FCCW.	5/2017
05/30/2017	3747	Howard, Theodore	10010 Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Participation in weekly "check-in" call with Plaintiffs' Litigation Team.	5/2017
06/01/2017	3747	Howard, Theodore	10010 Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Location in case file and transmission of deposition transcript requested by co-counsel A. Cioffi of LAJC (1.00); review and editing of draft of status update letter to clients and email communication with co-counsel B. Casaneda regarding same (50).	5/2017
06/02/2017	3747	Howard, Theodore	10010 Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Review and analysis of filings regarding contempt claims for breach of class action settlements in preparation for drafting of Motion for Order to Show Cause and supporting Memorandum.	5/2017
06/03/2017	3747	Howard, Theodore	10010 Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	0.00 0.00 0.00	0	Unbilled	Began work on drafting of Motion for Order to Show Cause as to why VDOC should not be held in contempt of court for its Agreement and supporting Memorandum of Law.	5/2017

Date	SWT/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice	Status	Narrative	Posted	
06/04/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel A. Turner of LAJC regarding status; continued work on drafting of Motion for Order to Show Cause.	6/2/17
06/08/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Email exchange with VDOC counsel R. Vorhis regarding VDOC's need for Plaintiff's position on proposed revisions to VDOC Operating Procedures (-50); review and editing of draft cover letter and draft Motion for Temporary Restraining Order addressing VDOC's failure to assure adequate access of attorneys at FCCW for purposes of client visits and email communications with co-counsel B. C. Castaneda re same (1.50).	6/2/17
06/10/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Continued work on drafting of Motion for Contempt papers.	6/2/17
06/12/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	1.00	0.00	0.00	0.00	08000	0	Unbilled	Conference and email communications with B. E. Powers to arrange for legal assistant help with fact-checking of class member Declarations intended to support Motion for Contempt.	6/2/17
06/13/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Conference with legal Ass'ts. R. Williams and H. Lynn regarding nature and scope of Plaintiff's Declarations Fact-Checking project (50); participation in weekly "check-in" call of Plaintiff's Litigation team (1.00).	6/2/17
06/15/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Receipt and review of ex parte communication from Compliance Monitor N. Schafft, M.D., regarding settlement implementation matters, and telephone and email communications with expert consultant R. Grelfinger and email communications with co-counsel B. Castaneda regarding same.	6/2/17
06/16/2017		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000	0	Unbilled	Participation in telephone conference with all co-counsel regarding strategy for responding to ex parte communication received from Compliance Monitor N. Schafft, M.D., and work on initial draft of proposed response.	6/2/17
06/17/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Continued work on Plaintiff's comments regarding draft Report of Compliance Monitor N. Schafft, M.D., April 2017 visit to FCCW (2.00); review of VDOC's revised Operating Procedures per terms of Settlement Agreement and provision of comments regarding same to VDOC counsel R. Williams (1.00).	6/2/17
06/18/2017		3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000	0	Unbilled	Continued work on Plaintiff's comments regarding draft Report of Compliance Monitor N. Schafft, M.D., April 2017 visit to FCCW and communications with LAJC co-counsel A. Turner regarding same.	6/2/17
06/19/2017		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000	0	Unbilled	Continued work on Plaintiff's consolidated comments to Dr. Schafft and email communications with LAJC co-counsel A. Turner regarding same.	6/2/17
06/20/2017		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000	0	Unbilled	Participation in weekly "check-in" telephone conference of Plaintiff's Litigation team (1.00); final editing of and revisions to Plaintiff's consolidated comments to Dr. Schafft; draft Report regarding April 2017 monitoring visit to FCCW and transmittal of same to Dr. Schafft (2.50).	6/2/17
06/22/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Review and editing of draft of letter to VDOC counsel R. Vorhis to follow up on Plaintiff's Document Requests to VDOC for documents reflecting VDOC's implementation of the parties' Settlement Agreement and email communications with LAJC co-counsel S. Ellis regarding same (1.50); review of comments and suggestions from LAJC co-counsel A. Cioffi concerning proposed response to ex parte communication from Compliance Monitor, Schafft, M.D. (1.00).	6/2/17
06/23/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Final editing of and revisions to letter to VDOC Counsel R. Vorhis setting forth Plaintiff's follow-up Document Requests (50); telephone conference and conference with Legal Assistants R. Williams and H. Lynn regarding status of fact-checking of clients' Declarations supporting Motion for Contempt (50).	6/2/17
06/24/2017		3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000	0	Unbilled	Resumed work on Memorandum in support of Motion for Order to Show Cause as to why Defendants should not be held in civil contempt for breach of obligations under Settlement Agreement (50).	6/2/17
06/25/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Continued work on draft of Memorandum in support of Contempt Motion and email communications with co-counsel regarding same.	6/2/17
06/26/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Preparation for and participation in telephone conference with LAJC co-counsel B. Castaneda, A. Turner and A. Cioffi regarding strategy for briefing of Contempt Motion.	6/2/17

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice Status	Narrative	Posted	
06/27/2017	3747	Howard, Theodore		10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in support of Contempt Motion (1:00); participation in weekly "check-in" call of Plaintiffs' litigation team (1:10); meeting with legal Assts. H. Lynn and R. Williams to discuss results of fact-checking of class members' Declarations intended to support Contempt Motion and follow-up email to co-counsel regarding same (50).	7/2017
06/29/2017	3747	Howard, Theodore		10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in support of proposed Contempt Motion (1:00); final editing of and revisions to draft e-communications with co-counsel (regarding same (100)). Plaintiffs to Compliance Monitor N. Schafft, M.D.'s informal proposal for conciliation between parties' representatives and draft e-memo to co-counsel regarding same.	7/2017
06/30/2017	3747	Howard, Theodore		10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Email communications with LAJC co-counsel and with legal Assts. H. Lynn and R. Williams regarding ongoing fact-checking documents of class members intended to support Contempt Motion.	7/2017
07/05/2017	3747	Howard, Theodore		10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Transmittal of e-memo to Compliance Monitor N. Schafft, M.D., regarding proposal concerning informal conciliation with VDOC and follow-up with co-counsel regarding same (1:00); review of documents received from VDOC concerning death of FCCW prisoner D. Taylor.	7/2017
07/07/2017	3747	Howard, Theodore		10010	Partner	0	0.50	397.50	775.00	0.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel S. Ellis of LAJC regarding follow-up with respect to mortality review of deceased FCCW prisoner D. Taylor.	7/2017
07/08/2017	3747	Howard, Theodore		10010	Partner	0	5.50	4,262.50	775.00	5.50	0.00	0.00	08000	0	Unbilled	Continued work on Plaintiffs' Motion for Contempt and supporting Memorandum and review and analysis of file documents and case authorities for same.	7/2017
07/09/2017	3747	Howard, Theodore		10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000	0	Unbilled	Continued work on Motion for Contempt and supporting Memorandum.	7/2017
07/10/2017	3747	Howard, Theodore		10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Review of response email from Compliance Monitor N. Schafft, M.D. concerning conciliation proposal and email communications with LAJC co-counsel B. Castaneda regarding same (1:00); continued preparation of Contempt Motion papers (1:50).	7/2017
07/11/2017	3747	Howard, Theodore		10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Review of media coverage regarding recently-settled Americans with Disabilities Act case against Florida Dept. of Corrections involving issues similar to those in pending ADA dispute with VDOC and email communications with co-counsel same (1:00); continued work on drafting of Motion for Contempt papers and draft transmittal email to co-counsel (forwarding efforts for review and comment (2:00)).	7/2017
07/12/2017	3747	Howard, Theodore		10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Continued work on drafting of Memorandum in support of Plaintiffs' Motion for Contempt and email communications with co-counsel regarding same.	7/2017
07/13/2017	3747	Howard, Theodore		10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Continued work on drafting of and revisions to Memorandum in support of Plaintiff's Motion for Contempt.	7/2017
07/24/2017	3747	Howard, Theodore		10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Continued drafting of and revisions to Memorandum in support of Plaintiffs' Motion for Contempt.	7/2017
07/25/2017	3747	Howard, Theodore		10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Draft e-memo to co-counsel regarding revised draft of Memorandum in support of Contempt Motion (5:0); participation in conference call of all Plaintiffs' counsel regarding current status, pending matters and new developments (1:00).	7/2017
07/29/2017	3747	Howard, Theodore		10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Initial review of records transmitted by FCCW concerning death of FCCW prisoner C. Lberto and draft e-memo to LAJC co-counsel A. Turner and S. Ellis regarding same.	7/2017
07/31/2017	3747	Howard, Theodore		10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Telephone conference with co-counsel A. Turner of LAJC regarding status with respect to Motion for Contempt and supporting Memorandum.	7/2017
08/03/2017	3747	Howard, Theodore		10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000	0	Unbilled	Email and telephone communications with Settlement Agreement Compliance Monitor N. Schafft, M.D., regarding status and draft e-memo to co-counsel reporting same.	8/2017
08/04/2017	3747	Howard, Theodore		10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Participation in telephone conferences of entire Plaintiffs' litigation team and with co-counsel B. Castaneda and A. Clark of LAJC regarding status of work on Motion for Contempt briefing, related matters, and suggested next steps.	8/2017

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice	Status	Narrative	Posted
08/05/2017		Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Review of draft memorandum to Settlement Agreement. Compliance Monitor N. Schafft, M.D., concerning pending issues of concern to Plaintiffs in advance of next monitoring visit to FCCW and email communications with co-counsel A. Turner regarding same.	8/2017
08/06/2017		Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Telephone conference with colleagues at LAJC to discuss preparation for meeting with newly-assigned lead counsel from VA Attorney General's Office.	8/2017
08/09/2017		Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Telephone conference with co-counsel A. Turner of LAJC regarding outcome of meeting with new opposing counsel and next steps.	8/2017
08/10/2017		Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000	0	Unbilled	Resumed work on Memorandum in support of Plaintiff's Motion for Order to Show Cause as to why Defendant VDOC should not be held in civil contempt for breach of Settlement Agreement.	8/2017
08/11/2017		Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in Support of Motion for Order to Show Cause regarding Defendants' breach of Settlement Agreement.	8/2017
08/15/2017		Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	08000	0	Unbilled	Preparation for and participation in weekly telephone conference and follow-up identification and transmission of medical records for deceased FCCW prisoner C. Liberto to LAJC co-counsel S. Ellis.	8/2017
08/16/2017		Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Continued work on drafting and ediling of Memorandum in support of Contempt Motion.	8/2017
08/17/2017		Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in support of Plaintiffs' Contempt Motion and email communications with co-counsel regarding same.	8/2017
08/18/2017		Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in support of Plaintiffs' Contempt Motion.	8/2017
08/20/2017		Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in support of Motion for Contempt.	8/2017
08/21/2017		Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in support of Motion for Contempt.	8/2017
08/22/2017		Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in support of Motion for Contempt.	8/2017
08/23/2017		Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Preparation for and participation in weekly "check-in" call of Plaintiffs' counsel to address strategy and next steps.	8/2017
															Legal research regarding case authorities addressing nature and scope of civil contempt sanctions (2-50); review and analysis of FCCW Mortality Review Reports for deceased FCCW prisoners D. Niece and C. Liberto and follow-up communications with co-counsel and with Plaintiffs' correctional medical expert-consultant R. Greifinger, M.D. regarding same (2,00).	
08/25/2017		Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in Support of Motion for Contempt.	8/2017
08/27/2017		Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in support of Motion for Contempt.	8/2017
08/28/2017		Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	08000	0	Unbilled	Review of Mortality Review Reports provided by FCCW concerning the deaths of FCCW prisoners D. Niece and C. Liberto, transmittal of same to Plaintiffs' correctional medical care expert/consultant R. Greifinger, M.D., telephone conference with Dr. Greifinger regarding same and email communications with co-counsel regarding substance of comments and concerns expressed by Dr. Greifinger (2-50); continued work on editing of and revisions to Memorandum in support of Plaintiffs' Motion for Contempt (3,50).	8/2017
08/29/2017		Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Continued work on revised draft of Memorandum in support of Plaintiffs' Motion for Contempt (2,50); email communications with Dr. Greifinger concerning follow-up regarding (DOJC)Amor Mortality Review Reports for D. Niece and C. Liberto (1,50).	9/2017
08/30/2017		Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Continued work on revised draft of Memorandum in support of Plaintiffs' Motion for Contempt (2,50); preparation for and participation in weekly telephone conference of all Plaintiffs' experts/consultant R. Greifinger, M.D., regarding Mortality Review issues and follow-up e-memo to co-counsel regarding same (1,00).	9/2017
08/31/2017		Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	08000	0	Unbilled	Memorandum in support of Plaintiffs' Motion for Contempt (3,00).	9/2017

Time Report
Billed and Unbilled
Washington Lawyers Committee for Civil / Fluvanna Medical Care Class Action (75459-21)

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice	Status	Narrative	Posted
09/01/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.08000	0	Unbilled	Review and editing of draft letter from co-counsel to newly-designated lead VDOC counsels regarding nature and scope of unresolved Settlement Agreement implementation issues and Plaintiffs' pending information requests and email communications with LAJC co-counsel regarding same.	9/2017
09/04/2017	3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	0.08000	0	Unbilled	Review and analysis of VDOC (Armor) death report and records for recently-deceased prisoner M. Johnson and draft e-memo to co-counsel regarding same (1.50); continued editing of and revisions to Memorandum in support of Motion for Contempt (2.50).	9/2017
09/05/2017	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	0.08000	0	Unbilled	Final editing of and revisions to Memorandum in support of Contempt Motion, including integration of cite-checking revisions, proofreading Table of Authorities, etc., and transmittal memo conveying final draft to LAJC co-counsel.	9/2017
09/06/2017	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.08000	0	Unbilled	Email communications with co-counsel and Firm Marketing Dept regarding media coverage for filing of Contempt Motion and supporting submissions.	9/2017
09/07/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.08000	0	Unbilled	Initial review of draft of Dr. Schaff's Monitoring Report for his Contempt Motion, including integration of cite-checking revisions, proofreading Table of Authorities, etc., and transmittal memo conveying final draft to LAJC co-counsel.	9/2017
09/11/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.08000	0	Unbilled	Email and telephone communications with LAJC co-counsel B. Castaneda, S. Ellis and A. Turner regarding strategic approach to discovery in support of Contempt Motion and related matters.	9/2017
09/13/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.08000	0	Unbilled	Email and telephone communications with LAJC co-counsel B. Castaneda, S. Ellis and A. Turner regarding strategic approach to discovery in support of Contempt Motion and related matters.	9/2017
09/18/2017	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.08000	0	Unbilled	Email communications with co-counsel and telephone conference with VDOC Counsel regarding inadvertent filing of incorrect motion for extension of time to respond to Plaintiffs' Motion for Contempt and proposed solutions.	9/2017
09/19/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.08000	0	Unbilled	Participate in weekly "check-in" call of Plaintiffs' counsel regarding status, strategy for next steps, etc.	9/2017
09/20/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.08000	0	Unbilled	Email communications with co-counsel regarding status, strategy for next steps, etc.	9/2017
09/25/2017	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.08000	0	Unbilled	Work on review and editing of LAJC co-counsel's comments concerning Dr. Schaff's current draft report regarding August 2017 monitoring visit to FCCW.	10/2017
09/26/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.08000	0	Unbilled	Review of FCCW/Armor Mortality Review Report regarding death of FCCW prisoner M. Johnson and draft e-memos to co-counsel and to Plaintiff's medical expert/consultant R. Grefensteger, M.D., and to Plaintiff's medical expert/consultant regarding same.	10/2017
09/27/2017	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	0.08000	0	Unbilled	Telephone conference with Plaintiff's medical care expert/consultant R. Grefensteger, M.D., concerning impressions of VDOC/Armor Mortality Review Report addressing death of FCCW prisoner M. Johnson and draft e-memo to co-counsel regarding same (1.50); continued work in weekly "check-in" call of Plaintiff's counsel (1.00); continued work on review and editing of LAJC co-counsel's comments on current draft Report of Compliance Monitor N. Schaff, M.D. (1.00).	10/2017
09/28/2017	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	0.08000	0	Unbilled	Preparation for and participation in telephone conference of co-counsel with Compliance Monitor N. Schaff, M.D., regarding Plaintiff's concerns with current draft monitoring Report (2.50); continued work on review and editing of LAJC co-counsel's comments on draft Schaff Report (1.00).	10/2017
09/29/2017	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	0.08000	0	Unbilled	Continued work on review and editing of LAJC co-counsel's comments to draft monitoring Report of N. Schaff, M.D.	10/2017
10/01/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.08000	0	Unbilled	Continued review and editing of LAJC co-counsel's comments to draft monitoring Report of N. Schaff, M.D.	10/2017
10/02/2017	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.08000	0	Unbilled	Completed review and editing of LAJC co-counsel's comments to Dr. Schaff's current draft monitoring Report and email communications with LAJC co-counsel A. Turner, B. Castaneda and S. Ellis regarding same.	10/2017
10/09/2017	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	0.08000	0	Unbilled	Recipient and initial review of Monitoring Report of Dr. Schaff based on August 2017 visit to FCCW and drafting of transmittal memorandum conveying initial impressions of Report to co-counsel.	11/2017
10/11/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.08000	0	Unbilled	Participation in weekly "check-in" call of Plaintiff's Counsel.	11/2017
10/12/2017	3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	0.08000	0	Unbilled	Organization and transmittal to all co-counsel of e-memo summarizing 10/11 Conference Call and outlining initial reactions to Defendant's Opposition to Plaintiff's Motion for Order to Show Cause re Contempt and other related matters.	11/2017

Time Report
 Billed and Unbilled
 Washington Lawyers Committee for Civil / Fluvala Medical Care Class Action (73459-21)

Date	SMT Task	Attorney Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice Status	Narrative	Posted	
10/16/2017	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	0.00	0	Unbilled	Completed editing of and revisions to transmittal letter concerning VDOC's proposed ADA Operating Procedure (1:50); review of D. Barndess' preliminary research results addressing legal standard governing issuance of Order to Show Cause and draft e-memo to addressing standards for issuance of Order to Show Cause (1:00).	11/2017
10/18/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	0	Unbilled	Final edits and revisions to correspondence to Compliance Monitor N. Schafft, M.D., regarding VDOC's proposed ADA Operating Procedure and transmittal of same to Dr. Schafft (1:00); review and analysis of D. Barndess' legal research supporting VDOC's Opposition to Plaintiffs' Motion for Order to Show Cause.	11/2017
10/19/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0	Unbilled	Review and analysis of e-mail from co-counsel S. Ellis concerning deconstruction of VDOC critique of Declarations regarding strategic considerations relevant to scheduling of hearing date on Plaintiffs' Contempt Motion.	11/2017
10/20/2017	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00	0	Unbilled	Initial drafting of Plaintiffs' Reply Memorandum in response to VDOC's Opposition to Plaintiffs' Motion for Order to Show Cause.	11/2017
10/22/2017	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	0.00	0	Unbilled	Continued work on drafting of Plaintiffs' Reply Memorandum in support of Motion for Order to Show Cause and communications with co-counsel re same.	11/2017
10/23/2017	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	0.00	0	Unbilled	Preparation in support of their Motion for Order to Show Cause and email and telephone communications with co-counsel at LAC regarding same.	11/2017
10/24/2017	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	0.00	0	Unbilled	Continued work on drafting of Plaintiffs' Reply Memorandum in support of Motion for Order to Show Cause and communications with co-counsel re same.	11/2017
10/25/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	0	Unbilled	Continued work on drafting of Plaintiffs' Reply Memorandum in support of Motion for Order to Show Cause and communications with co-counsel re same.	11/2017
10/26/2017	3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	0.00	0	Unbilled	Preparation for and participation in weekly check-in call of Plaintiffs' litigation team (1:00); continued work on drafting of Plaintiffs' Reply Memorandum (1:00).	11/2017
10/27/2017	3747	Howard, Theodore	10010	Partner	0	10.00	7,750.00	775.00	10.00	0.00	0.00	0.00	0	Unbilled	Continued and completed drafting of Plaintiffs' Reply Memorandum in support of Motion for Order to Show Cause and communications with co-counsel re same.	11/2017
10/29/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0	Unbilled	Continued work on drafting of Plaintiffs' Reply Memorandum in support of Motion for Order to Show Cause and communications with co-counsel re same.	11/2017
10/30/2017	3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	0.00	0	Unbilled	Review of consolidated comments of all co-counsel to draft of Plaintiffs' Reply Memorandum in support of Motion for Order to Show Cause.	11/2017
10/31/2017	3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	0.00	0	Unbilled	Completed editing of and revisions to Reply Memorandum in support of Motion for Order to Show Cause and transmittal of same to all co-counsel for review and comment.	11/2017
11/01/2017	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	0.00	0	Unbilled	All-day meeting of Plaintiffs' counsel team at LAC in Charlottesville, VA and driving time from home to Charlottesville and return travel.	11/2017
11/05/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	0	Unbilled	Review of consolidated comments of all co-counsel to draft of Plaintiffs' Reply Memorandum in support of Motion for Order to Show Cause.	11/2017
11/07/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	0	Unbilled	Continued editing of and revisions to Reply Memorandum in support of Motion for Order to Show Cause and transmittal of same to co-counsel for review and comment.	11/2017
11/08/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	0	Unbilled	Plaintiffs' concerns with most recent Monitoring Report and email communications with LAC co-counsel A. Cioffi regarding same (1:30).	11/2017
11/09/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	0	Unbilled	Telephone conference with WLC co-counsel A. Cioffi concerning planning for upcoming activities in anticipation of evidentiary hearing on Plaintiffs' Contempt Motion (1:50); email communications with B. Powers regarding needed legal assistance, help with management of document discovery in advance of evidentiary hearing (1:50).	11/2017
11/10/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel regarding concerns with respect to recent strip-searching of clients prior to legal visits with counsel and with co-counsel regarding VDOC written medical grievance procedure.	11/2017
11/07/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	0	Unbilled	Preparation for and participation in weekly check-in call of Plaintiffs' Litigation Team (1:00); participation in telephone conference with co-counsel and VDOC counsel regarding pending procedural and discovery scheduling matters (1:00); e-mail memorandum to Plaintiffs' expert-consultant R. Greifinger, M.D. concerning VDOC's revised Continuous Quality Improvement policy and review and revisions to draft letter to VDOC counsel regarding medical grievances procedure revisions (1:00).	11/2017

Time Report
 Billed and Unbilled
 Washington Lawyers Committee for Civil / Fluvaria Medical Care Class Action (75459-21)

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Org Hrs	Org Att	Org Rate	Rev Hrs	Rev Att	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
11/09/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Telephone communications with Plaintiff's expert/consultant R. Greifinger, M.D., concerning (DOC's) revised draft CQI policy and draft e-memo to co-counsel concerning same.	11/2017	
11/13/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Email exchange with co-counsel regarding various matters of concern arising in conjunction with pending Motion for Civil Contempt and proposed strategies for going forward.	11/2017	
11/14/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding status (50); review and editing of draft e-memo to Compliance Monitor N. Schafft, M.D., concerning on-going medical care problems associated with FCCW's excessive utilization of licensed Practical Nurses in place of more qualified medical professionals and e-mail communications with co-counsel regarding same (100); email communications with co-counsel concerning proposed procedural schedule for discovery and related matters leading up to evidentiary hearing on Motion for Civil Contempt (50).	11/2017	
11/15/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Review and editing of LAJC co-counsel B. Castaneda's draft of letter to VDOC addressing plaintiff's concerns with revised co-pay policy and email communications with B. Castaneda re same..	11/2017	
11/16/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Review and editing of revised draft of letter to VDOC prepared by LAJC and comments and suggestions regarding VDOC draft of Continuous Quality Improvement Program (50); review of draft of proposed Consent Motion concerning access to records of mentally-incompetent FCCW prisoners unable to provide knowing consent to disclosure and email communications with LAJC co-counsel A. Ciolfi regarding same (50); email communications with LAJC co-counsel regarding comments and suggestions concerning draft email to Compliance Monitor N. Schafft, M.D., addressing ongoing problems with performance of licensed Practical Nurses entrusted by FCCW with diagnosis and treatment responsibilities (100).	11/2017	
11/17/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Participation in weekly "check-in" call of Plaintiff's Litigation Team (1.00); email communications with co-counsel A. Ciolfi concerning communications with Compliance Monitor N. Schafft, M.D., regarding various pending matters (100).	11/2017	
11/20/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Email communications with AJC co-counsel B. Castaneda and A. Ciolfi regarding VDOC's revised co-payment policy and draft letter to Compliance Monitor N. Schafft, M.D., respectively.	11/2017	
11/21/2017	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Final editing of and revisions to letter to Compliance Monitor N. Schafft, M.D., setting forth Plaintiff's counsel's concerns with AJC co-counsel A. Ciolfi regarding same, and transmittal of letter to Dr. Schafft.	11/2017	
11/22/2017	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000	0	Unbilled	Email communications with AJC co-counsel regarding Dr. Schafft's initial reaction to Plaintiff's letter expressing concerns about monitoring activities.	11/2017	
11/27/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Preparation for and participation in telephone conference with Legal Assts. R. Williams and H. Lynn and LAJC co-counsel A. Ciolfi and S. Elias regarding planning for VDOC document production during discovery phase of preparation for hearing on Plaintiff's Motion for Contempt and follow-up email communications with R. Williams regarding same.	11/2017	
11/28/2017	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	LAJC co-counsel to determine strategy for proceeding in light of Plaintiff's Motion for Contempt and follow-up email communications with R. Williams regarding planning for VDOC document production during discovery phase of preparation for hearing on Plaintiff's Motion for Contempt and follow-up email communications with R. Williams regarding same.	11/2017	
11/29/2017	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Preparation for and participation in weekly "check-in" call of Plaintiff's counsel regarding status and proposed next steps (100); email and telephone communications with Compliance Monitor N. Schafft regarding scheduling of call to discuss substance of Plaintiff's letter addressing monitoring methodology issues (50).	11/2017	

Date	SM/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice Status	Narrative	Posted	
11/30/2017	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Preparation for and participation in telephone conference with Compliance Monitor, N. Schaff, M.D., to discuss substance of letter from Plaintiff's criticizing aspects of performance of monitoring functions and proposed solutions (1.50); review and analysis of case materials relevant to ADA and Continuous Quality Improvement (COI) policies at FCCW in preparation for meeting with opposing counsel (1.00).	12/20/17
12/01/2017	3747	Howard, Theodore	10010	Partner	0	8.00	6,200.00	775.00	8.00	0.00	0.00	08000	0	Unbilled	Preparation for and participation in meeting with co-counsel and VDOC counsel at LAJC in Charlottesville, concerning various unresolved pending matters including VDOC's draft Americans with Disabilities Operating Procedure, and travel to Charlottesville and return travel to home for same.	12/20/17
12/03/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Draft and transmission of e-memo to VDOC Defendants' counsel regarding 12/1 meeting and proposed next steps including scheduling of next meeting.	12/20/17
12/04/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Review and editing of Plaintiff's First Set of Document Requests to VDOC re Contempt issues.	12/20/17
12/05/2017	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Continued editing of and revisions to Plaintiff's First Set of Requests for Documents to VDOC re Contempt Issues and email communications with co-counsel A. Ciolfi regarding same.	12/20/17
12/06/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Participation in weekly "Check-in" call of Plaintiff's Litigation Team regarding case status and strategy.	12/20/17
12/07/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Review and editing of revised draft of Document Requests to VDOC regarding Contempt issues and provisions of comments regarding same.	12/20/17
12/08/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Review of revised and proposed final draft of Plaintiff's Document Requests to VDOC and email communications with co-counsel A. Ciolfi regarding same.	12/20/17
12/10/2017	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Further editing of and revisions to draft Requests for Production of Documents to be served on VDOC (1.00); draft e-memo to VDOC Counsel concerning Plaintiff's intention to request a Status Conference and transmittal to co-counsel for review and comment (1.50).	12/20/17
12/11/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Final editing of and revisions to Document Requests to VDOC and email communications with co-counsel A. Ciolfi regarding same.	12/20/17
12/13/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Participation in weekly "Check-in" call of Plaintiff's Litigation Team.	12/20/17
12/16/2017	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Editing of and revisions to draft memorandum to opposing counsel regarding Plaintiff's intention to request a Status Conference and transmittal of same.	12/20/17
12/17/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Draft e-memo to opposing counsel D. Abato concerning Document Production Protocol issues and follow-up with co-counsel A. Ciolfi and Legal Asst. R. Williams concerning same.	12/20/17
12/18/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Participation in telephone conference of Plaintiff's counsel with Compliance Monitor, N. Schaff, M.D., concerning initial reactions to and comments regarding most recent monitoring report and follow-up with co-counsel regarding same (1.50); email communications with Legal Asst. R. Williams and P. Michel of Litigation Support regarding Document Production Protocol issues (1.00).	12/20/17
12/19/2017	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Preparation for and participation in telephone conference with co-counsel and counsel for VDOC regarding Document Production Protocol issues; and follow-up with R. Williams and P. Michel regarding same (1.50); participation in weekly "Check-in" call of Plaintiff's Litigation Team (1.00); organization of materials needed for participation in 12/21/17 meeting with opposing counsel (1.00).	12/20/17
12/20/2017	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel A. Ciolfi and P. Michel of Lit. Support regarding draft response to counsel for VDOC for and participation in meeting of Plaintiff's and Defendants' counsel to confer regarding various pending settlement-related matters at VA Attorney General's Office in Richmond, VA and travel time regarding same (3.00).	12/20/17
12/21/2017	3747	Howard, Theodore	10010	Partner	0	9.00	6,975.00	775.00	9.00	0.00	0.00	08000	0	Unbilled	Location and transmittal of 3/28/15 letter from client B. Pearce per request of co-counsel B. Castaneda (1.00); email communications with co-counsel A. Ciolfi and P. Michel of Lit. Support regarding revisions to draft Doc. Production Protocol based upon 12/20/17 call with opposing counsel and transmittal of same to opposing counsel D. Abato and R. Vorhis (2.00).	12/20/17

Date	SM/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Att	Orig Rate	Rev Hrs	Rev Att	Rev Rate	Service Activity	Invoice	Status	Narrative	Posted
12/27/2017	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Review of e-mail from opposing counsel regarding Document Production Protocol and follow-up communications with co-counsel and with P. Michel of Litigation Support regarding same.	12/2017
12/28/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	E-mail communications with co-counsel A. Ciolfi and S. Ellis of Legal Aid Justice Center regarding possible contact with prospective replacement compliance monitor candidates and regarding revised draft of Plaintiffs' Initial Disclosures.	12/2017
12/29/2017	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000	0	Unbilled	Telephone and e-mail communications with opposing counsel D. Abato concerning initiation of VDOC's rolling document production (-50); work on drafting of Plaintiffs' Response to VDOC's stated position with respect to pending Document Production Protocol issues; and e-memo to P. Michel of Litigation Support concerning same (3.00).	12/2017
01/02/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,350.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Email communications with P. Michel of Litigation Support and with opposing counsel D. Abato regarding revised draft of Document Production Protocol.	1/2018
01/03/2018	3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000	0	Unbilled	Participation in weekly "Check-in" call of Plaintiffs' Litigation Team (1.00); email communications with opposing counsel D. Abato regarding Document Production Protocol and VDOC email production issues (1.00); review of comments of co-counsel and integration into Plaintiffs' Consolidated Comments or draft Report of Dr. Schafft summarizing November 2017 Compliance Monitoring Visit to FCCW (2.00).	1/2018
01/04/2018	3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	08000	0	Unbilled	Continued work on integration and synthesis of all co-counsel input into Plaintiffs' Consolidated Comments to current draft Schafft Report (5.00); email communications with opposing counsel D. Abato regarding concerns with respect to logistics, cost and timing of VDOC email production and email communications with co-counsel regarding same (1.00).	1/2018
01/05/2018	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Integration of and final editing of and revisions to Plaintiffs' Consolidated Comments to current draft transmittal e-mail to N. Schafft, M.D., regarding same.	1/2018
01/07/2018	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000	0	Unbilled	Draft e-memo to opposing counsel regarding scheduling of conference call to discuss issues associated with production of VDOC emails responsive to Plaintiffs' Document Requests.	1/2018
01/09/2018	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Participation in telephonic conference with co-counsel and opposing counsel D. Abato concerning production issues with opposing counsel D. Abato concerning production issues with respect to VDOC emails responsive to Plaintiffs' Document Requests.	1/2018
01/10/2018	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Email communications with P. Michel of Lit. Support, co-counsel and opposing counsel D. Abato regarding pending VDOC document production matters (1.50); participation in weekly VDOC conference call of Plaintiffs' Litigation Team and follow-up with co-counsel regarding same (1.50).	1/2018
01/11/2018	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Email communications with P. Michel of Litigation Support and email communications with co-counsel and with opposing counsel regarding VDOC email production issues (1.50); email communications with co-counsel A. Ciolfi concerning expert witness discovery scheduling matters (1.00).	1/2018
01/12/2018	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Telephone conference with Plaintiffs' corrective medical care expert/counsel R. Grafting, M.D., concerning status and next steps in preparation for hearing on Motion for Contempt and follow-up e-memo to co-counsel regarding same.	1/2018
01/16/2018	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding various pending discovery and expert witness issues.	1/2018
01/17/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Participation in weekly call of Plaintiffs' Litigation Team (1.00); email communications with co-counsel and with counsel for VDOC regarding pending discovery matters (1.00).	1/2018
01/18/2018	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Telephone conference with co-counsel and counsel for VDOC concerning pending discovery matters (1.00); participation in training re use of Relativity document database provided by P. Michel of IT Dept; and email communications with co-counsel regarding same (1.50); telephone conference with co-counsel A. Ciolfi concerning possible conflict-of-interest issues presented by appearance of E. McNabb and E. Muldowney of Sands Anderson firm as co-counsel for VDOC (50).	1/2018

Time Report
 Billed and Unbilled
 Washington Lawyers Committee for Civil / Fluvanna Medical Care Class Action (75459-21)

Date	SMT/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs.	Orig Amt	Orig Rate	Rev Hrs.	Rev Amt	Rev Rate	Service Activity	Invoice	Status	Narrative	Posted
01/19/2018	3747	Howard, Theodore		10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	0.00	0	Unbilled	Telephone and email communications with co-counsel regarding prospective Motion to Disqualify concerning VDOC's new co-counsel, Sanders Anderson; possible retention of Correctional Nursing Expert J. Clarke; and pending discovery issues	1/2018
01/21/2018	3747	Howard, Theodore		10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0	Unbilled	Transmission of electronic copies of relevant materials to Plaintiff's correctional medicine expert/consultant R. Greifinger, M.D. to assist in preparation of expert report in support of Plaintiff's Motion and email communications with co-counsel S. Ellis regarding same.	1/2018
01/22/2018	3747	Howard, Theodore		10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel regarding conflict-of-interest concerns presented by VDOC's retention of former Armor counsel as co-counsel (1.00); email communications with expert R. Greifinger, M.D., regarding evidentiary matters (.50).	1/2018
01/23/2018	3747	Howard, Theodore		10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel regarding pending discovery matters and scheduling of requested status conference. 2/2018	1/2018
01/24/2018	3747	Howard, Theodore		10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel and participation in weekly Plaintiff's Litigation Team conference call.	1/2018
01/25/2018	3747	Howard, Theodore		10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0	Unbilled	Review and editing of Motion to Amend Scheduling Order to include Expert Report deadlines (.50); draft and transmission of emails to co-counsel re deposition scheduling and to opposing counsel re email production priorities (1.00).	1/2018
01/26/2018	3747	Howard, Theodore		10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel regarding pending discovery matters and prospective motion for disqualification.	1/2018
01/28/2018	3747	Howard, Theodore		10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	0	Unbilled	Review and analysis of case file materials and preparation for 1/29 Status Conference and participation in Plaintiff's Litigation Team meeting regarding discovery and trial preparation.	1/2018
01/29/2018	3747	Howard, Theodore		10010	Partner	0	9.00	6,975.00	775.00	9.00	0.00	0.00	0.00	0	Unbilled	Participation in telephonic Status Conference and Plaintiff's Litigation Team meeting at co-counsel's office in Charlottesville, VA and round-trip travel for same.	1/2018
01/30/2018	3747	Howard, Theodore		10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	0.00	0	Unbilled	Email communications with expert R. Greifinger, M.D., regarding evidence to be reviewed in connection with preparation of report (.50); email communications with opposing counsel concerning Status Conference (.50); telephone conference with opposing counsel concerning pending discovery matters (.50); work with co-counsel and legal ass't. H. Lyon on finalization and electronic transmission of document subpoenas to UVA and UVC Medical Centers (2.00).	1/2018
01/31/2018	3747	Howard, Theodore		10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel regarding discovery deposition scheduling and related discovery matters (1.00); email communications with expert R. Greifinger, M.D., and with P. Michel of IT Dept regarding transmission of electronic discovery materials for Dr. Greifinger's review (.50).	1/2018
02/01/2018	3747	Howard, Theodore		10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0	Unbilled	Email communications with opposing counsel regarding deposition scheduling and related discovery matters (.50); email communications with expert R. Greifinger, M.D., and with P. Michel of IT Dept regarding transmission of electronic discovery materials for Dr. Greifinger's review (.50).	1/2018
02/02/2018	3747	Howard, Theodore		10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	0.00	0	Unbilled	Preparation and service of Notices of Deposition for VDOC witnesses. J. Ohman, S. Helmick, D. Whitehead and E. Aldridge (1.50); telephone conf. with co-counsel A. Ciolfi regarding pending discovery matters (.50); meeting with associate B. Corbin to discuss assistance with discovery matters (.50); conference and email communications with P. Michel of IT Dept regarding pending LSI issues (.50).	1/2018
02/05/2018	3747	Howard, Theodore		10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	0.00	0	Unbilled	Continued review and editing of Document Requests to be served via Plaintiff's Subpoena Ducus; return to Armor Correctional Health Services, Inc. and email communications with co-counsel A. Ciolfi regarding same.	1/2018

Date	SMT Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Kovoice	Status	Narrative	Posted	
02/06/2018	3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel and colleagues H. Lynn and R. Williams regarding preparation of spreadsheet chart depicting parties dispute to accompany anticipated Motion to Compel addressing VDOC's deficient production of documents responsive to Plaintiffs' Requests to accompany completed revisions to Document Requests to accompany Plaintiff's document subpoena to Armor Correctional Health Servs., Inc. and transmittal and service of same (2:00); drafting of meet-and-confer letter to VDOC Counsel regarding VDOC's failure to provide email discovery from VDOC officials and employees (1:00).	2/2018
02/07/2018	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	0.00	0.00	0	Unbilled	Participation in weekly Scott Team conference call (1:00); email communications with Caplan, Caplan & Caplan Process Servers of Miami, FL re service of document subpoena upon Armor Correctional Health (1:50); drafting of meet-and-confer letter to VDOC Counsel regarding email discovery issue (2:00).	2/2018
02/08/2018	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	0.00	0.00	0	Unbilled	Telephone and email communications with expert witness R. Greifinger, MD, regarding initial reactions to review of clients' medical records and follow-up e-memo to co-counsel regarding same (1:30); final editing of and revisions to meet-and-confer letter to VDOC counsel addressing VDOC email discovery issue and transmittal of same (1:00); conference with associate B. Corbin to discuss provision of assistance with pending discovery disputes.	2/2018
02/09/2018	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel A. Ciolfi regarding scheduling of depositions (1:50); telephone conference with opposing counsel D. Abalo in response to Plaintiff's request to meet and confer concerning VDOC email discovery and follow-up e-memo to co-counsel regarding same (1:50); transmittal of VDOC CQI Report re FCCCN to expert witness R. Greifinger, MD and email communications with same re same (1:50); work preparation for drafting of Motion to Compel with respect to deficiencies in VDOC response to Plaintiff's Document Requests (1:00).	2/2018
02/12/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0.00	0	Unbilled	Telephone conference with opposing counsel in response to Plaintiff's Document Requests and email to co-counsel summarizing same.	2/2018
02/13/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	0.00	0	Unbilled	Telephone and email communications with Plaintiff's expert witness R. Greifinger and follow-up communications with co-counsel regarding nature and scope of his anticipated expert report (1:50); conference with Legal Ass't H. Lynn regarding collection and preparation of documentary exhibits for deposition of VDOC Health Services Director S. Hemick (1:50).	2/2018
02/14/2018	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0.00	0	Unbilled	Drafting of Plaintiff's second meet-and-confer letter addressing deficiencies in VDOC's responses to Plaintiff's Document Requests.	2/2018
02/15/2018	3747	Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	0.00	0.00	0	Unbilled	Final editing of and revisions to Plaintiff's to follow-up meet-and-confer letter to VDOC and transmittal of same to opposing counsel (1:00); drafting of e-memo to VDOC counsel providing Plaintiff's initial Expert Witness Disclosures (1:00); telephone conference with expert R. Greifinger, M.D.; regarding substance and scope of expert report and draft e-memo to co-counsel regarding same (1:50); work with Legal Ass't H. Lynn on assembly of possible exhibits for use in deposition of VDOC Health Servs. Director S. Hemick and review and analysis of same to prepare for deposition (2:50).	2/2018
02/16/2018	3747	Howard, Theodore	10010	Partner	0	8.00	6,200.00	775.00	8.00	0.00	0.00	0.00	0.00	0	Unbilled	Conducting of deposition of VDOC Health Servs. Director S. Hemick and travel time to Richmond, VA and return travel for same.	2/2018
02/19/2018	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	0.00	0.00	0	Unbilled	Initial review of first draft of Report of Plaintiff's' correctional medical expert R. Greifinger, M.D., and email communications with Dr. Greifinger regarding same.	3/2018
02/20/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0.00	0	Unbilled	Participation in telephone conference with co-counsel and Plaintiff's expert witnesses J. Clark, R. N. and R. Greifinger, M.D., preparation of expert reports in support of Plaintiff's' Contempt Motion.	3/2018

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice	Status	Narrative	Posted
02/21/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel and opposing counsel regarding request of Armor Correctional Health Servs. for additional time to produce documents requested by Plaintiffs' third-party subpoena (80); email communications with co-counsel S. Ellis re: Plaintiff's third-party document subpoenas (20).	3/2018
02/22/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding pending document discovery matters including scheduling of meet-and-confer telephone conference with VDOC counsel to address concerns with document production in response to Plaintiffs' document Requests.	3/2018
02/23/2018	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	387.50	0.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel A. Cioffi regarding status and pending discovery matters.	3/2018
02/26/2018	3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000	0	Unbilled	Continued drafting of Memorandum in support of Motion for Preliminary Injunction and email communications with Library Research Staff regarding research assistance needed in connection with same.	3/2018
02/26/2018	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Preparation for 2/27 / meet-and-confer conference call with opposing counsel regarding unresolved document production concerns and email communications with co-counsel regarding same.	3/2018
02/27/2018	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Preparation for and participation in meet-and-confer telephone conference with co-counsel and VDOC counsel regarding Plaintiffs' concerns with deficiencies in VDOC's document production responsive to Plaintiffs' Document Requests.	3/2018
03/01/2018	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Emails to co-counsel A. Cioffi and S. Ellis regarding intended follow-up on various items pending and unaddressed due to pending obligations in other cases relating to document discovery matters.	3/2018
03/04/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Review and editing of updated revised draft of expert report of R. Greifinger, M.D., and email communications with Dr. Greifinger regarding same.	3/2018
03/05/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Email communications with Dr. Greifinger regarding further revisions to draft expert report (50); follow-up with legal assistant H. Lynn regarding status of responses to medical records subpoenas to UVA and VCU Medical Centers (50); email communications with L. Fleming of UVA General Counsel's Office, regarding additional procedural requirements to trigger response to medical records subpoena (50); email communications with co-counsel regarding preparation for participation in upcoming meet-and-confer telephone conference with opposing counsel (50).	3/2018
03/05/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Preparation for and participation in telephone conference of Plaintiffs' counsel with Compliance Monitor N. Scharff, M.D., regarding current draft report (1.00); participation in telephone conference of Plaintiffs' attorneys with expert witness J. Clark regarding matters clearly to be covered by report (1.00); email communications with co-counsel regarding preparations for upcoming discovery meet-and-confer call with Defendants' counsel and review of relevant discovery materials regarding same (1.00).	3/2018
03/06/2018	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Participation in meet-and-confer telephone conference of Plaintiffs' counsel with counsel for VDOC concerning pending document discovery issues (1.00); participation in regularly-scheduled call of Plaintiffs' litigation team concerning status of all pending matters and next steps (1.00); review of VDOC's expert witness disclosures and transmittal of same to Dr. Greifinger for review and comment (50).	3/2018
03/07/2018	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Initial review of VDOC's Motion for Protective Order, to Modify Scheduling Order and for Containment and email and telephone communications with co-counsel regarding same (1.50); transmittal to opposing counsel of information regarding Plaintiffs' unresolved Document Requests and proposed next steps regarding VDOC's response to same (1.50).	3/2018
03/09/2018	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Telephone conf. with L. Fleming of UVA Gen. Counsel's Office concerning required certification letter as required provisions of VA Code, preparation of same and submission of same in regard to medical records subpoena (1.50); email communications with co-counsel A. Cioffi regarding proposed discovery matters (50); counsels' inquiry regarding pending discovery matters (50); telephone conference with Legal assistant H. Lynn regarding status of medical records subpoena to VCU Med. Center (50).	3/2018

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice Status	Name/Ref	Posted	
03/11/2018	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000	0	Unbilled	Review of co-counsel comments on draft of expert report of R. Greifinger, M.D. and email communications with Dr. Greifinger regarding same (2:00); work on analysis and integration of co-counsel comments on draft of current report of Compliance Monitor N. Schafft, M.D. based upon February 2018 monitoring visit to FCCW (1:00); email communications with counsel for Armor Correctional Health regarding its response to Plaintiffs' Document Requests (1:50).	3/2018
03/12/2018	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000	0	Unbilled	Continued work on analysis and consolidation of Plaintiffs' counsels comments on draft of Compliance Monitor Schafft's report on Feb. 2018 monitoring visit to FCCW (2:50); email communications with R. Greifinger, M.D. regarding revisions to draft expert report (1:00).	3/2018
03/13/2018	3747	Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	08000	0	Unbilled	Editing of and revisions to revised draft of R. Greifinger, M.D.'s expert report and email communications with Dr. Greifinger regarding same (2:00); continued work on Plaintiffs' integrated comments to draft of Compliance Monitor Schafft's report summarizing Feb. 2018 monitoring report and review of D. Schafft's final report (1:50); email communications with Litigation Support as Assistant P. Michel regarding preparation of Plaintiffs' Responses to Defendants' First Request for Production of Documents and email communications with Defendants' counsel regarding same (1:00).	3/2018
03/14/2018	3747	Howard, Theodore	10010	Partner	0	6.50	5,037.50	775.00	6.50	0.00	0.00	08000	0	Unbilled	Participation in meet-and-confer telephone conference of Plaintiffs' counsel with Defendants' counsel regarding Plaintiffs' Rule 30(b)(6) deposition notice to VDOC (1:00); participation in weekly call of Plaintiffs' Litigation Team (1:00); review of proposed draft Protective Order submitted by counsel for Armor Correctional Health and email communications with co-counsel and counsel for Armor regarding same (1:50); work with Plaintiffs' expert R. Greifinger, M.D. on revisions to expert report and coordination of provision of additional documents for review by Dr. Greifinger in connection with same (3:00).	3/2018
03/15/2018	3747	Howard, Theodore	10010	Partner	0	8.00	6,200.00	775.00	8.00	0.00	0.00	08000	0	Unbilled	Telephone and email communications with R. Greifinger, M.D. on final editing of and revisions to expert report and work with legal assistant H. Lynn on transmission of documents to be reviewed by Dr. Greifinger in connection with same (4:00); drafting of Plaintiffs' Rule 26 Expert Disclosure Statement (or transmittal to Defendants) with Plaintiffs' Expert Reports (1:00); preparation and service of Subpoena and Notice of Deposition to Dr. T. Gable of Armor Correctional Health (1:00); email communications with co-counsel regarding work product issues arising in connection with Defendants' Document Request for communications between Plaintiffs' counsel and Compliance Monitor N. Schafft, M.D. (1:00); transmittal of Plaintiffs' consolidated comments on draft monitoring report to Dr. Schafft (1:00).	3/2018
03/16/2018	3747	Howard, Theodore	10010	Partner	0	10.00	7,750.00	775.00	10.00	0.00	0.00	08000	0	Unbilled	Participation in meeting of Plaintiffs' Litigation Team regarding discovery and trial preparation matters and travel from home to Charlottesville, VA and return travel.	3/2018
03/18/2018	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding issue concerning responsibility for travel expenses associated with depositions of parties' expert witnesses; and regarding interpretation of intended scope of Protective Order governing Plaintiffs' Rule 34 inspections of FCCW (1:50); initial review of Defendants' Motion for Protective Order, to Amend Scheduling Order and for Continuance (1:00).	3/2018
03/19/2018	3747	Howard, Theodore	10010	Partner	0	6.50	5,037.50	775.00	6.50	0.00	0.00	08000	0	Unbilled	Work with P. Michel and R. Williams to coordinate service of Plaintiffs' Objections and Responses to Defendants' First Request for Production of Documents and accompanying document production (1:50); review and editing of Plaintiffs' response to Defendants' meet-and-confer letter concerning Plaintiffs' Rule 30(b)(6) Deposition Notice to VDOC and email communications with co-counsel regarding same (1:50); review of updated VDOC Document Production Summary Chart and email communications with co-counsel regarding same (2:00); work on Plaintiffs' Opposition to Defendants' Motion for Protective Order and other relief (1:50).	3/2018

Date	SMT Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice	Status	Narrative	Posted
03/20/2018	3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	0.00	0	Unbilled	Receipt and initial review of client medical records produced by UVA Med. Ctr. in response to third-party document subpoena and conference with legal assistant H. Lynn regarding same (1.50); Williams to address technological issues with Plaintiff's document production to Defendants (1.00); further review and editing of VDOC Document Production Summary; Chen and email communication with co-counsel regarding same (1.50); email communication with co-counsel regarding issue raised by Defendants' counsel with Plaintiffs Rule 30(b)(6) Notice to VDOC (1.00).	3/20/18
03/21/2018	3747	Howard, Theodore	10010	Partner	0	2.50	1,997.50	775.00	2.50	0.00	0.00	0.00	0	Unbilled	Participation in weekly call of Plaintiff's Litigation Team (1.50); continued work on Plaintiff's Opposition to Defendants' Motion for Protective Order and other relief (1.00).	3/20/18
03/22/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0	Unbilled	Initial review of Defendants' Opposition to Plaintiff's Motion for Preliminary Injunction and supporting papers and email communications with co-counsel regarding same.	3/20/18
03/22/2018	3747	Howard, Theodore	10010	Partner	0	8.00	6,200.00	775.00	8.00	0.00	0.00	0.00	0	Unbilled	Drafting of Memorandum of Law in Opposition to Defendants' Motion for Protective Order and Other Relief and email communications with co-counsel regarding same.	3/20/18
03/23/2018	3747	Howard, Theodore	10010	Partner	0	7.00	5,425.00	775.00	7.00	0.00	0.00	0.00	0	Unbilled	Completed drafting of Plaintiff's Opposition to Defendants' Motion for Protective Order and Other Relief; editing of and revisions to same, organization and compilation of supporting exhibits, and work with legal assistant H. Lynn regarding filing and service of same (6.00); telephone and email communications with co-counsel B. Costaneda regarding crafting and transmission of response to Defendants' inquiries regarding evidentiary citations in Dr. Greifinger's expert report (1.00).	3/20/18
03/23/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0	Unbilled	Telephone conference with WLC co-counsel C. Diana and H. Lieberman regarding preliminary thoughts concerning Reply to Defendants' Opposition to Plaintiff's Motion for Preliminary Injunction and draft e-memo to Wiley Team regarding research assistance with respect to preparation of Plaintiff's Reply Brief (3.00); telephone and email communications with co-counsel B. Costaneda regarding discovery and trial preparation issues.	3/20/18
03/24/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0	Unbilled	Draft letter to and e-correspondence with Mag. Judge Hoppe's Chambers regarding sealed exhibit supporting Plaintiff's Memorandum in Opposition to Defendants' Motion for Protective Order and other relief (1.00); email communications with co-counsel concerning various pending discovery matters (2.00).	3/20/18
03/26/2018	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	0.00	0	Unbilled	Editing of and revisions to VDOC Document Production Chart, telephone conference with co-counsel A. Cloffri regarding same and transmission of same to Defendants' counsel (1.50); email communications with co-counsel regarding various pending discovery matters (1.00).	4/20/18
03/27/2018	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel regarding pending discovery matters (1.00); e-memo to Defendants' counsel (0.50); regarding outstanding discovery requests and status of response (50).	4/20/18
03/29/2018	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel and Defendants' counsel regarding pending discovery matters.	4/20/18
03/30/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel and Defendants' counsel regarding pending discovery matters.	4/20/18
04/09/2018	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel, opposing counsel and C. Constantine of Vantek, Inc., regarding evolving deposition schedule (1.50); email communications with P. Michel and H. Lynn regarding discovery responses and related matters (1.50).	4/20/18
04/10/2018	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel regarding deposition scheduling and logistical planning for same.	4/20/18
04/11/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	0	Unbilled	Participation in weekly Plaintiff's litigation team call (1.00); drafting of Subpoena and Notice of Deposition for N. Schafft, M.D. and e-service of same (1.00).	4/20/18
04/12/2018	3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	0.00	0	Unbilled	Preparation for and participation in parties' telephone hearing with Mag. Judge Hoppe addressing Defendants' Motion for Protective Order regarding Plaintiff's Rule 30(b)(6) Deposition Notice to VDOC (1.50); telephone conference with Plaintiff's correctional medical care expert R. Greifinger regarding planning for preparation for upcoming deposition (1.50); oversight and supervision of Plaintiff's document production in response to Defendants' Second Requests for Documents and email and telephone conferences with P. Michel and H. Lynn regarding same (2.00).	4/20/18

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	O/Hrs.	O/Hr. Amt	O/Hr. Rate	Rev Hrs.	Rev Amt	Rev Rate	Service Activity	Invoice	Status	Narrative	Posted
04/13/2018	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	0.08000	0	Unbilled	Editing of and revisions to draft Rule 30(b)(6) Notice of Deposition to Armor Correctional Health Services, Inc. and electronic service of same upon Armor Counsel (1.50); transmission of record materials to Plaintiffs' expert witness, R. Greifinger, M.D., for review in preparation for upcoming deposition (1.00);	4/2018
04/14/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.08000	0	Unbilled	Review and editing of draft log of withheld documents to accompany Plaintiffs' production in response to Defendants' Second Request for Documents and email communications with H. Lynn regarding same.	4/2018
04/15/2018	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	0.08000	0	Unbilled	Review and analysis of Defendants' expert reports and supporting materials in preparation for preparing Plaintiffs' expert, G. Greifinger, M.D., for upcoming deposition.	4/2018
04/16/2018	3747	Howard, Theodore	10010	Partner	0	6.50	5,037.50	775.00	6.50	0.00	0.00	0.08000	0	Unbilled	Email communications and conferences with P. Michel and H. Lynn regarding privilege log and pending issues relating to Plaintiffs' responses to Defendants' Third Request for Documents (2.50); email communications with co-counsel and opposing counsel regarding re-burden of R. Greifinger deposition and rescheduling of N. Scharff deposition and telephone and email communications with G. Constantine or Venttek regarding same (1.50); gathering of information concerning parties of Defendants' witnesses J. Dilman, T. Gable and S. Herrick for Defendants' witnesses J. Dilman, T. Gable and S. Herrick for purposes of review to prepare plaintiffs' expert R. Greifinger, M.D., for deposition (2.50).	4/2018
04/17/2018	3747	Howard, Theodore	10010	Partner	0	10.00	7,750.00	775.00	10.00	0.00	0.00	0.08000	0	Unbilled	Review of transcripts of depositions of Defendants' witnesses of meeting from Washington, DC to New York, NY for purposes of meeting with R. Greifinger, M.D. to prepare for deposition by Defendants' witness J. Dilman, T. Gable and S. Herrick for preparation by Dr. Greifinger (4.00); meeting with Dr. Greifinger, deposition (5.50); telephone conf. with P. Michel regarding document production issues arising in connection with Plaintiffs' supplemental production in response to Defendants' First Request for Documents (5.00).	4/2018
04/18/2018	3747	Howard, Theodore	10010	Partner	0	10.00	7,750.00	775.00	10.00	0.00	0.00	0.08000	0	Unbilled	Defending of Defendants' deposition of Plaintiffs' correctional medical expert R. Greifinger, M.D. (7.00); return travel from New York, NY to Washington, DC (2.00).	4/2018
04/19/2018	3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	0.08000	0	Unbilled	Draft e-memo to co-counsel summarizing R. Greifinger deposition and issues arising in connection with same (1.50); email communications with co-counsel; Defendants' counsel and G. Constantine of VanText concerning deposition scheduling and logistics (1.00); begin work on drafting of Plaintiffs' Memorandum in Opposition to Defendants' Motion to Extend Time And/or to Strike (1.50).	4/2018
04/20/2018	3747	Howard, Theodore	10010	Partner	0	6.50	5,037.50	775.00	6.50	0.00	0.00	0.08000	0	Unbilled	Completed drafting of Plaintiffs' Opp. to Defendants' Mot. to Extend Time And/or for Stay; editing of and revisions to same, and assistance with e-filing of same (4.00); participation in meet-and-confer telephone conference with co-counsel and opposing counsel regarding Armor 30(b)(6) Deposition (1.50); draft e-memo to co-counsel regarding proposal by Defendants' counsel to postpone trial and commence settlement negotiations (1.00); conference with Legal Asst. H. Lynn regarding status of preparation of logs of documents withheld from Plaintiffs' productions in response to Defendants' Second and Third Requests for Documents (1.00).	4/2018
04/22/2018	3747	Howard, Theodore	10010	Partner	0	1.50	1,182.50	775.00	1.50	0.00	0.00	0.08000	0	Unbilled	Review of outline for Plaintiffs' deposition of Compliance Monitor N. Scharff, M.D. and conference with co-counsel A. Ciolfi regarding same.	4/2018
04/23/2018	3747	Howard, Theodore	10010	Partner	0	7.00	5,425.00	775.00	7.00	0.00	0.00	0.08000	0	Unbilled	Attendance and participation in Plaintiffs' deposition of Compliance Monitor N. Scharff, M.D., and multiple conferences with co-counsel A. Ciolfi regarding same.	5/2018
04/24/2018	3747	Howard, Theodore	10010	Partner	0	1.50	1,182.50	775.00	1.50	0.00	0.00	0.08000	0	Unbilled	Conference with co-counsel G. Constantine of Venttek regarding completion of Defendants' deposition, current discovery status and next steps (1.00); email communications with G. Constantine or Venttek regarding Defendants' expert A. Joshua, M.D. (5.0).	5/2018
04/25/2018	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	0.08000	0	Unbilled	Participation in weekly call of Plaintiffs' Litigation Team regarding discovery status, trial preparation, settlement possibilities, etc. (2.00); review of draft of Plaintiffs' Supplemental Rule 30(b)(6) Dispositions (3.0).	5/2018
04/27/2018	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	0.08000	0	Unbilled	Participation in videoconference deposition of Defendants' expert A. Joshua, M.D. and multiple conferences with co-counsel B. Castaneda regarding same.	5/2018

Time & Report
Billed and Unbilled
Washington Lawyers Committee for Civil / Fluvaria Medical Care Class Action (75455-21)

Date	SMT Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs.	Orig Amt	Orig Rate	Rev Hrs.	Rev Amt	Rev Rate	Service Activity	Invoice	Status	Narrative	Posted
04/28/2018		3747	Howard, Theodore	10010 Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	0.08000	0	Unbilled	Review of relevant record documents and other materials to prepare for Rule 30(b)(6) deposition of VDOC.	5/2018
04/29/2018		3747	Howard, Theodore	10010 Partner	0	7.50	5,812.50	775.00	7.50	0.00	0.00	0.08000	0	Unbilled	Review and analysis of record documents and related materials in preparation for Rule 30(b)(6) deposition of VDOC, drafting of outline for oral examination and email communications with co-counsel A. Cloff regarding same.	5/2018
04/30/2018		3747	Howard, Theodore	10010 Partner	0	13.00	10,075.00	775.00	13.00	0.00	0.00	0.08000	0	Unbilled	Rule 30(b)(6) deposition of VDOC designated witness S. Henrick, Ph.D., and conferences with co-counsel A. Cloff regarding same (7.50); participation with co-counsel A. Cloff in settlement discussion with Defendants' counsel D. Abato, v. Perkins and K. London (1.50); travel to Richmond, VA for deposition and return travel (4.00).	5/2018
05/01/2018		3747	Howard, Theodore	10010 Partner	0	5.50	4,262.50	775.00	5.50	0.00	0.00	0.08000	0	Unbilled	Editing and revisions to Plaintiffs' Logs for documents withheld from productions in response to Defendants' Second and Third Requests, telephone conf. with co-counsel S. Ellis and conference with legal assistant H. Lynn regarding same (3.00); email communications with co-counsel E. Hanes to provide factual background information for Plaintiffs' Opposition to Amur Motion for Protective Order with respect to Rule 30(b)(6) Deposition Notice (1.00); email communications with opposing counsel D. Abato regarding VDOC provision of records concerning death of VDOC prisoner D. Reed (1.00); email communications with opposing counsel N. Schnetzer regarding rescheduling of incomplete Rule 30(b)(1) deposition of VDOC Health Services Administrator S. Henrick (50).	5/2018
05/02/2018		3747	Howard, Theodore	10010 Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.08000	0	Unbilled	Email communications with opposing counsel N. Schnetzer regarding rescheduling of remainder of Rule 30(b)(1) deposition of S. Henrick (50); email communications with co-counsel regarding Plaintiff's position on Defendants' Motion requesting that case be referred to mediation (50).	5/2018
05/03/2018		3747	Howard, Theodore	10010 Partner	0	8.50	6,587.50	775.00	8.50	0.00	0.00	0.08000	0	Unbilled	Attendance and participation in trial preparation meeting of Plaintiffs' Litigation Team at Legal Aid Justice Center in Charlottesville, VA and round trip travel time for same.	5/2018
05/04/2018		3747	Howard, Theodore	10010 Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.08000	0	Unbilled	Final editing of and revisions to Plaintiffs' Privilege Logs and service of same upon opposing counsel (1.00); telephone conference w/ co-counsel A. Cloff and review of emails from co-counsel regarding discovery status, scheduling of mediation, etc. (1.00).	5/2018
05/06/2018		3747	Howard, Theodore	10010 Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.08000	0	Unbilled	Telephone conference with Plaintiff's medical expert R. Greifinger, M.D., concerning possible preparation of rebuttal report to respond to opinions of Defendants' expert witness, etc. (50).	5/2018
05/07/2018		3747	Howard, Theodore	10010 Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.08000	0	Unbilled	Communications with co-counsel regarding pending motions and preparation for hearing on pending motions.	5/2018
05/08/2018		3747	Howard, Theodore	10010 Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	0.08000	0	Unbilled	Email communications with opposing counsel regarding withheld documents reflecting Plaintiffs' ex parte communications with Compliance Monitor N. Schnetzer, M.D. (1.00); preparation for and participation in conference call of Plaintiffs' counsel to prepare for Court-ordered Mediation (1.50).	5/2018
05/09/2018		3747	Howard, Theodore	10010 Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.08000	0	Unbilled	Communications with co-counsel regarding preparation for upcoming mediation and related matters (2.00); participation in weekly call of Plaintiffs' Litigation Team regarding pending discovery matters, trial preparation, etc. (1.50).	5/2018
05/10/2018		3747	Howard, Theodore	10010 Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	0.08000	0	Unbilled	Receipt and review of draft Rebuttal Report of Plaintiffs' medical expert R. Greifinger, M.D. (1.00); review of draft of Settlement Outline and provision of comments to co-counsel A. Cloff regarding same (1.00); communications with opposing counsel N. Schnetzer regarding rescheduling of resumed deposition of VDOC Health Service Director S. Henrick (50); preparation for and participation in telephonic motions hearing of all counsel with Magistrate Judge Hope (3.50).	5/2018
05/11/2018		3747	Howard, Theodore	10010 Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	0.08000	0	Unbilled	Communications with opposing counsel regarding rescheduling of S. Henrick deposition (50); preparation for and participation in telephone conference of Plaintiffs' counsel with Mediator M. Rubin in preparation for upcoming Mediation (2.00); review and editing of co-counsel A. Cloff's initial draft of Plaintiffs' Confidential Mediation Statement and email communications with same (50).	5/2018

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Org Hrs	Org Att	Org Rate	Rev Hrs	Rev Att	Rev Rate	Service Activity	Invoice Status	Narrative	Posted	
05/12/2018	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding notice from UVA Medical Center of rejection of proposal by VDOC to assume responsibility for provision of medical care at FCCW and implications of same for upcoming Mediation and parties settlement discussions.	5/2018
05/13/2018	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Email communications with G. G. Constantine of Veritext concerning scheduling of upcoming depositions and related logistics (-30); review of co-counsel A. Cioffo's draft of Plaintiff's Mediation Statement and email communications with same regarding same (2:00).	5/2018
05/14/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Continued communications with co-counsel and with G. Constantine of Veritext regarding court reporter arrangements for upcoming depositions (-30); email communications with co-counsel and Plaintiff's expert R. Greifinger; M. D., concerning preparation of proposed rebuttal expert report (1:50).	5/2018
05/15/2018	3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000	0	Unbilled	Email communications with Plaintiff's expert R. Greifinger concerning possible rebuttal report (1:50); conference with K. White of Library Research Staff regarding requested research concerning applicability of Prison Lit. Reform Act attorney hourly rate cap in the context of post-judgment enforcement proceedings (1:00); email communications with co-counsel concerning disputes with Defendants' counsel over Plaintiff's proposed use of Dr. D. Young, FCCW OBGYN, as fact witness (-30); Review and editing of co-counsel A. Cioffo's draft of proposed Opening Statement for Mediation (1:00); organization and review of relevant case document in preparation for participation in Mediation (2:00).	5/2018
05/16/2018	3747	Howard, Theodore	10010	Partner	0	20.50	15,887.50	775.00	20.50	0.00	0.00	08000	0	Unbilled	Preparation for and participation in mediation of contempt motion of defendant (15:50); preparation for and participation in mediation of contempt motion of plaintiff (15:50); driving time from home to Charlottesville and from Charlottesville to home (5:00).	5/2018
05/17/2018	3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000	0	Unbilled	Preparation for resumed Rule 30(b)(1) deposition of VDOC Health Services Director S. Henrick; conferences with legal assistant H. Lynn regarding preparation of exhibits for same and email communications with co-counsel regarding same.	5/2018
05/18/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Telephone conference with co-counsel concerning discovery issue arising in connection with expert witness G. Lewis, PhD., and confidentiality restrictions on some of the materials upon which he relied in developing his expert opinions.	5/2018
05/18/2018	3747	Howard, Theodore	10010	Partner	0	8.00	6,200.00	775.00	8.00	0.00	0.00	08000	0	Unbilled	Preparation for and conducting of resumed deposition of VDOC Health Services Director S. Henrick (4:00); travel time to and from Richmond, VA for same (4:00).	5/2018
05/19/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Draft e-memo to co-counsel addressing substance of defense witness S. Henrick's Rule 30(b)(6) deposition testimony (1:00); initial review of draft of Statement of Facts for Plaintiff's Pretrial Brief and email communications with co-counsel regarding same.	5/2018
05/20/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Telephone and email communications with Plaintiff's correctional medical expert R. Greifinger, M.D., concerning preparation of Rebuttal Report (1:50); email communications with co-counsel addressing aftermath of mediation and next steps concerning possible continuance of trial date (3:0).	5/2018
05/22/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Preparation of draft Table of Contents for Plaintiff's Pretrial Brief and circulation of same to co-counsel for preliminary review (1:50); email communications with co-counsel regarding status of research on timing of contempt issue (1:50).	5/2018
05/24/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Editing of and revisions to Dr. Greifinger's draft Rebuttal Report and telephone conference with same re same.	5/2018
05/25/2018	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000	0	Unbilled	Telephone conference with Dr. Greifinger regarding suggested final revisions to Rebuttal Report, review of final draft of same and transmittal of same to co-counsel (1:00); participation in co-counsel in telephone conference with Compliance Monitor N. Schaff, M.D., regarding comments on draft Monitoring Report for April 2018 visit to FCCW (1:00); work on drafting of Plaintiff's Pretrial Brief (1:50).	5/2018
05/26/2018	3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	08000	0	Unbilled	Drafting of Plaintiff's Pretrial Brief (5:00); review of revised draft of Statement of Facts for same (1:00).	5/2018
05/28/2018	3747	Howard, Theodore	10010	Partner	0	7.00	5,425.00	775.00	7.00	0.00	0.00	08000	0	Unbilled	Continued drafting of Plaintiff's Pretrial Brief and editing of revisions to same.	5/2018

Time Report
Billed and Unbilled
Washington Lawyers Committee for Civil / Fluvaria Medical Care Class Action (7543921)

Date	SMT	Task	Attorney Name	Staff Level	Description	Rate	Ong Hrs	Ong Amt	Ong Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
05/29/2018		3747	Howard, Theodore	10010	Partner	0	12.50	9,687.50	775.00	12.50	0.00	0.00	0.00	0.00	0	Unbilled	Completed drafting of Plaintiff's Preliminary Brief, editing of and revisions to same; legal research for same; compilation for telephone hearing of all counsel with Mag. Judge Hoppe, deceased FCCW prisoner D. Reed (1:00); participation in telephone hearing of all counsel with Mag. Judge Hoppe concerning pending motions (2:00); draft letter to Judge Moon's Chambers regarding transmittal of courtesy copy of Plaintiff's Preliminary Brief and supporting Exhibits (5:0); draft email memo to Mag. Judge Hoppe's Chambers concerning submission of sealed Exhibit held in support of Plaintiff's Preliminary Brief (1:00); email communications with co-counsel regarding status and next steps concerning trial preparation (1:00).	6/2018
05/30/2018		3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel regarding various pending trial preparation and pretrial matters.	6/2018
05/31/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0.00	0	Unbilled	Various trial preparation activities; including email communications with co-counsel regarding finalizing of Plaintiff's Exhibit (1:00).	6/2018
06/01/2018		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	0.00	0	Unbilled	Work on various trial preparation matters.	6/2018
06/02/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0.00	0	Unbilled	Telephone conference and email communications with co-counsel A. Cioffi regarding draft of Plaintiff's Opposition to Defendants' Motion for Summary Judgment.	6/2018
06/03/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0.00	0	Unbilled	Review and analysis of Plaintiff's expert R. Greifinger, M.D.'s initial and rebuttal reports and draft e-memo to co-counsel C. Nash of Howard & Randall concerning viable arguments for Opposition to Defendants' Motion to Strike and Exclude Dr. Greifinger's Expert Testimony.	6/2018
06/04/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0.00	0	Unbilled	Telephone conference with co-head counsel A. Cioffi of LAJC regarding trial preparation and strategy issues.	6/2018
06/05/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0.00	0	Unbilled	Working with Legal Ass't. H. Lynn on identification and gathering of documents cited and relied upon by Dr. Greifinger in initial and rebuttal expert reports for use as possible trial exhibits (2:50); email various trial preparation-related activities, including review of prior briefs and submissions to the Court; Compliance Monitor's Reports etc. (2:50).	6/2018
06/06/2018		3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	0.00	0.00	0	Unbilled	Review and analysis of pending pretrial motions in preparation for hearing on same and oral arguments on 6/8 and telephone conferences and email communications with co-counsel regarding same (4:50); draft email communications with accounting service (4:50); draft e-memo to co-counsel regarding request for prompt payment of outstanding bills of expert witnesses and court reporting service (2:50); email communications with co-counsel P. Michael of Litt, Support, and H. Lynn, Legal Ass't., regarding status of Document Production to Defendants; of documents obtained via ex parte document requests to VDOC and UVA medical center (1:00).	6/2018
06/07/2018		3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	0.00	0.00	0	Unbilled	Attendance and participation in hearing convened by Court on all remaining pretrial motions in Lynchburg, VA and driving time from office to Lynchburg and Lynchburg to home.	6/2018
06/08/2018		3747	Howard, Theodore	10010	Partner	0	12.50	9,687.50	775.00	12.50	0.00	0.00	0.00	0.00	0	Unbilled	Organization and aggregation of all case file materials needed for trial (5:50); participation in conference call with co-counsel regarding trial preparation (1:00); driving time from home to Charlottesville, VA for trial (2:50).	6/2018
06/09/2018		3747	Howard, Theodore	10010	Partner	0	9.00	6,975.00	775.00	9.00	0.00	0.00	0.00	0.00	0	Unbilled	Drafting of comprehensive outline of direct testimony for Plaintiff's medical care R. Greifinger, MD; and meeting with Dr. Greifinger to work on preparation of direct testimony (9:50); other general trial preparation (1:00).	6/2018
06/10/2018		3747	Howard, Theodore	10010	Partner	0	10.50	8,137.50	775.00	10.50	0.00	0.00	0.00	0.00	0	Unbilled	Attendance and participation in first day of trial on Plaintiff's Motion to Contempt, including presentation of direct testimony of Plaintiff's medical expert witness R. Greifinger, M.D., and preparation with co-counsel for second day of trial.	6/2018
06/11/2018		3747	Howard, Theodore	10010	Partner	0	12.00	9,300.00	775.00	12.00	0.00	0.00	0.00	0.00	0	Unbilled	Attendance and participation in second day of trial on Plaintiff's Motion to Contempt, including preparation and presentation of argument to the Court on Defendants' Motion for Judgment at conclusion of Plaintiff's case-in-chief conference with co-counsel to recap second day of trial, and preparation for third day of trial.	6/2018
06/12/2018		3747	Howard, Theodore	10010	Partner	0	12.00	9,300.00	775.00	12.00	0.00	0.00	0.00	0.00	0	Unbilled		

Time Report
Billed and Unbilled
Washington Lawyers Committee for Civil / Fluvaria Medical Care Class Action (73439-21)

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice	Status	Narrative	Posted
06/13/2018	3747	Howard, Theodore	10010	Partner	0	12.00	9,300.00	775.00	12.00	0.00	0.00	0.00	0	Unbilled	Attendance and participation in third day of trial on Plaintiffs' Motion for Contempt, including cross-examination of Health Services' Director of VDOC, Stephen Henrick, Ph.D., conference with co-counsel to recap third trial day, and preparation for fourth day of trial.	6/2018
06/15/2018	3747	Howard, Theodore	10010	Partner	0	12.00	9,300.00	775.00	12.00	0.00	0.00	0.00	0	Unbilled	Attendance and participation in fourth day of trial on Plaintiffs' Motion for Contempt and conference with co-counsel to recap fourth trial day (8.50); review of deposition transcripts and other case materials to prepare for cross-examination of Defendants' medical care expert A. Joshua, M.D. (3.50); drafting of Plaintiffs' Closing Argument and exchange of emails with co-counsel regarding same (4.00).	6/2018
06/16/2018	3747	Howard, Theodore	10010	Partner	0	16.00	12,400.00	775.00	16.00	0.00	0.00	0.00	0	Unbilled	Preparation in for and attendance and participation in final day of trial on Plaintiffs' Motion for Contempt, including cross-examination of Defendants' medical care expert A. Joshua, M.D. and communications with the Court regarding post-trial proceedings.	6/2018
06/19/2018	3747	Howard, Theodore	10010	Partner	0	12.00	9,300.00	775.00	12.00	0.00	0.00	0.00	0	Unbilled	Return travel from Charlottesville, VA to home.	6/2018
06/20/2018	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	0.00	0	Unbilled	Email communications with Compliance Monitor N. Scharff, M.D., regarding post-trial status and next steps pending Court's resolution of Contempt Motion.	6/2018
06/21/2018	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0	Unbilled	Participation in conference call of all counsel with Judge Moon's client, C. Julian, regarding proposed for post-trial briefing format and schedule (30); participation in conference call of Plaintiffs' Litigation Team for trial debriefing (7.00).	6/2018
06/22/2018	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00	0	Unbilled	Telephone conference with L.A.C. co-counsel A. Ciolfi regarding confirmation of proposed format and schedule for post-trial briefing.	6/2018
06/24/2018	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0	Unbilled	Final editing of and revisions to draft of Closing Argument prepared for presentation at conclusion of bench trial on Plaintiffs' Motion for Contempt and transmission of same to co-counsel for briefing.	6/2018
06/25/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0	Unbilled	Identification and forwarding of outstanding Venire/Court Reporting invoices for processing and payment.	6/2018
06/27/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0	Unbilled	Attention to outstanding court reporter and expert witness invoices for services rendered (30); email communications with co-counsel regarding procurement of copies of missing filings to complete Readings File (50).	6/2018
07/05/2018	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00	0	Unbilled	Email communications with opposing counsel N. Schatzker regarding proposed resolution of payment issues for services of parties' respective experts.	7/2018
07/11/2018	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00	0	Unbilled	Email communications with Compliance Monitor N. Scharff, M.D., regarding status with respect to Court's resolution of Plaintiffs' Contempt Motion.	7/2018
07/13/2018	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00	0	Unbilled	Email communications with Court Reporters regarding arrangements concerning payments for services rendered in preparation of Trial Transcripts.	7/2018
07/14/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0	Unbilled	Email communications with Court-approved Compliance Monitor N. Scharff, M.D., regarding arrangements for payment of expenses for appearance at deposition by Plaintiffs.	7/2018
07/15/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel S. Ellis and Compliance Monitor N. Scharff regarding emergent medical situation involving Plaintiff M. Ryder.	7/2018
07/16/2018	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00	0	Unbilled	E-correspondence with court reporters to resolve issues relating to preparation of trial transcripts (1.00); email communications with co-counsel A. Ciolfi regarding next steps relating to preparation of Plaintiffs' Post-Trial submissions (50).	7/2018
07/23/2018	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0	Unbilled	E-correspondence with court reporters to resolve issues relating to preparation of trial transcripts (1.00); email communications with co-counsel A. Ciolfi regarding next steps relating to preparation of Plaintiffs' Post-Trial submissions (50).	8/2018
07/24/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	0	Unbilled	Continued review and editing of initial draft of Plaintiffs' Proposed Findings of Fact (2.00); work on outlining of Plaintiffs' Proposed Conclusions of Law (1.00); email communications with co-counsel re addressing transcription errors by Court Reporters in preparation and submission of trial transcripts (50); email communications with co-counsel at L.A.C. regarding reports of defendant health care and premature deaths at Virginia Correctional Ctr. for Women in Goochland, VA and whether we can assist with addressing same (1.00).	8/2018
07/25/2018	3747	Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	0.00	0	Unbilled	Editing of and revisions to draft of Plaintiffs' Proposed Findings of Fact and draft e-memo to co-counsel providing comments and suggestions.	8/2018

Time Report
Billed and Unbilled
Washington Lawyers Committee for Civil / Cluveria Medical Care Class Action (75459-21)

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice Status	Narrative	Posted	
07/27/2018	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	regarding cite-checking project with respect to Plaintiff's Proposed Findings of Fact (1.00); continued work on Plaintiff's Proposed Conclusions of Law (1.50).	8/2018
07/28/2018	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Continued work on drafting of Plaintiff's Proposed Conclusions of Law.	8/2018
07/29/2018	3747	Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	08000	0	Unbilled	Continued work on drafting of Plaintiff's Proposed Findings of Fact and editing of and revisions to first draft of same.	8/2018
07/30/2018	3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000	0	Unbilled	Completed first draft of Plaintiff's Proposed Conclusions of Law. Edited and revisions to same and transmittal of draft to co-counsel for review and comment.	8/2018
07/31/2018	3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	08000	0	Unbilled	Editing of and revisions to drafts of Plaintiff's Proposed Findings of Fact and Proposed Conclusions of Law and email communications with co-counsel regarding same (5.50); draft email to opposing counsel concerning proposed extension of time for filing of Parties' Post-Trial submissions (5.0).	8/2018
08/01/2018	3747	Howard, Theodore	10010	Partner	0	7.00	5,425.00	775.00	7.00	0.00	0.00	08000	0	Unbilled	Editing of and revisions to draft of Plaintiff's Proposed Conclusions of Law and circulation of revised draft to all co-counsel for review and comment (4.50); editing of and revisions to revised draft of Plaintiff's Proposed Findings of Fact (1.00); and email communications with Judge Moon's Chambers regarding same (1.50); continued and completed work on initial draft of Plaintiff's Post-Trial Brief and circulation of same to co-counsel (2.50).	8/2018
08/02/2018	3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000	0	Unbilled	Preparation and editing of Consent Motion for Extension of Time and email communications with Judge Moon's Chambers regarding same (1.50); continued and completed work on initial draft of Plaintiff's Post-Trial Brief (1.50).	8/2018
08/03/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Telephone and email communications with co-counsel A. Cioffi regarding status of preparation of Plaintiff's Post-Trial filings and next steps.	8/2018
08/05/2018	3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	08000	0	Unbilled	Continued work on editing of and revisions to Plaintiff's Proposed Findings of Fact and Proposed Conclusions of Law and Post-Trial Brief and email communications with co-counsel concerning same.	8/2018
08/06/2018	3747	Howard, Theodore	10010	Partner	0	9.00	6,975.00	775.00	9.00	0.00	0.00	08000	0	Unbilled	Final editing of and revisions to Plaintiff's Proposed Findings of Fact; Conclusions of Law and Post-Trial Brief; emails with co-counsel regarding same and work with Legal Asst. E. White on final preparation of all submissions and editing of same.	8/2018
08/07/2018	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000	0	Unbilled	Initial review and analysis of Defendants' Post-Trial Brief and telephone conference with co-counsel A. Cioffi and email communications with other co-counsel regarding same (2.50); conference with Legal Asst. E. White regarding preparation of case notebooks for cases cited in Defendants' Post-Trial Brief and aggregation of Plaintiff's Trial Exhibits cited in Plaintiff's Proposed Findings of Fact for purposes of transmission to Judge Moon's Chambers (1.00).	8/2018
08/08/2018	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Draft transmittal letter to Judge Moon's chambers and assist Legal Asst. E. White with preparation and transmittal of courtesy copies of Proposed Findings of Fact, supporting admitted Trial Exhibits, Proposed Conclusions of Law and Post-Trial Brief (2.00); email communications with co-counsel regarding proposed strategy for responding to jurisdictional argument for denial of contempt presented in Defendants' Post-Trial Brief (1.00).	8/2018
08/09/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Preparation and participation in telephone conference with co-counsel regarding approach to responding to Defendants' Post-Trial Brief and jurisdictional argument set forth therein.	8/2018
08/10/2018	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Legal research and analysis of case authorities relevant to VDOC's jurisdictional challenge to authority of the Court to render a finding on contempt under Rule 65(d); Fed. R. Civ. P. and draft email to co-counsel regarding same.	8/2018
08/12/2018	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Telephone conference with co-counsel regarding proposed strategy for responding to Court's contention that Court lacks jurisdiction to award findings of civil contempt due to failure to comply with requirements of Rule 65(d) concerning injunctive relief (1.50); began work on drafting of Plaintiff's Post-Trial Response Brief (2.00).	8/2018
08/14/2018	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000	0	Unbilled	Continued work on draft of Plaintiff's Post-Trial Response Brief and email communications with co-counsel regarding same.	8/2018
08/15/2018	3747	Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	08000	0	Unbilled	Continued work on draft of Plaintiff's Post-Trial Response Brief and email communications with co-counsel regarding same.	8/2018

Date	SMT Task	Attorney Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice Status	Narrative	Posted	
08/16/2018	3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	08000	0	Unbilled	Continued drafting of Plaintiff's Post-Trial Response Brief, legal research for same concerning Fed. R. Civ. P. 65(d) issues, and email communications with co-counsel regarding same.	8/2018
08/17/2018	3747	Howard, Theodore	10010	Partner	0	6.50	5,037.50	775.00	6.50	0.00	0.00	08000	0	Unbilled	Continued drafting of Plaintiff's Post-Trial Response Brief, review and analysis of relevant case authorities for same, and email communications with co-counsel regarding same.	8/2018
08/18/2018	3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000	0	Unbilled	Continued drafting of Plaintiff's Post-Trial Response Brief.	8/2018
08/19/2018	3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000	0	Unbilled	Continued and completed draft of Plaintiff's Post-Trial Response Brief, editing of and revisions to same, and draft transmittal memo to co-counsel forwarding draft for review and comment.	8/2018
08/20/2018	3747	Howard, Theodore	10010	Partner	0	7.50	5,812.50	775.00	7.50	0.00	0.00	08000	0	Unbilled	Completed revised draft of Plaintiff's Post-Trial Response Brief based on comments and suggestions received from co-counsel and assisting with e-filing of same (50).	8/2018
08/23/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Email and telephone communications with co-counsel regarding status.	9/2018
08/28/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding emerging medical situation involving class member A. Nichols and proposed communication to FCCW Medical Director regarding same (50); review of notes prepared by co-counsel S. Ellis summarizing initial meeting with new FCCW Medical Director P. Targonski (50); email communications with co-counsel regarding provision of Plaintiff's consolidated comments with respect to current draft report of Compliance Monitor N. Schafft, M.D. (100).	9/2018
08/31/2018	3747	Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	08000	0	Unbilled	Review of consolidated comments from co-counsel on Compliance Monitor N. Schafft, M.D.'s draft of current monitoring report and synthesizing of same into Memo to Dr. Schafft and transmittal of same to Dr. Schafft (4,00); telephone conference w/ opposing counsel E. McNeils regarding proposal for pursuing negotiated resolution of Plaintiff's attorneys' fees claim associated with civil contempt proceedings and draft email to co-counsel regarding same (50).	9/2018
09/04/2018	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000	0	Unbilled	Email communications with Legal Aid Justice co-counsel A. Croff regarding quantification of attorneys' fees and costs incurred by Plaintiff's in prosecuting civil contempt action.	9/2018
09/06/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel A. Croff regarding qualification of attorney's fees and litigation expenses incurred in contempt phase for purposes of possible negotiation of attorney's fees and costs issue by negotiation.	9/2018
09/18/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Review and analysis of firm time and expense records in connection with Defendants' invitation to resolve attorney's fees and costs issue by negotiation.	9/2018
09/19/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Drafting e-memo to co-counsel providing aggregate attorneys' fees and litigation costs information for purposes of inclusion in fees and litigation costs information for purposes of inclusion in development of settlement proposal to Defendants.	10/2018
09/20/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Drafting e-memo to Defendants' counsel discounting calculations for purposes of formulation of settlement proposal to Defendants.	10/2018
09/21/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding attorneys' fees claim relating to Contempt Phase of litigation.	10/2018
09/23/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding VR inputs to fee-cost settlement proposal prepared for submission to Defendants' counsel and revisions to same.	10/2018
09/24/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding revisions to draft of proposed offer to Defendants' counsel to resolve Contempt Phase attorney's fees and costs.	10/2018
10/04/2018	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000	0	Unbilled	Initial review of VDOC/Amor Mortality Review Report for deceased FCCW prisoner C. Marfield and forwarding copy of same to co-counsel.	10/2018
11/06/2018	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000	0	Unbilled	Receipt from FCCW and transmittal to co-counsel of initial VDOC/Amor incident reports concerning death of FCCW inmate M. Crawford.	12/2018

Date	SMT	Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice	Status	Narrative	Posted
11/09/2018		3747	Howard, Theodore		10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.08000	0	Unbilled	Receipt from FCCW, initial review, and transmission to co-counsel of VDOC's revised Mortality Review concerning death of FCCW inmate K. Mareess (1.00); draft email to opposing counsel E. McNelis to follow up on Plaintiffs' "highlow" proposal to resolve attorneys' fees issue in Contempt; Phone on negotiated basis and email exchange with LAJC co-counsel A. Cuff regarding same (1.50).	12/2018
11/20/2018		3747	Howard, Theodore		10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.08000	0	Unbilled	Initial review and analysis of draft Report of Compliance Monitor N. Schaff, M.D., regarding most recent monitoring visit of FCCW (1.00); follow-up with co-counsel regarding belated receipt of FDOC's Amor Mortality Review concerning death of FCCW inmate M. Crawford and transmission of review to co-counsel (50).	12/2018
11/30/2018		3747	Howard, Theodore		10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.08000	0	Unbilled	Investigation regarding status of unpaid invoice of Plaintiffs' expert J. Clark.	12/2018
12/10/2018		3747	Howard, Theodore		10010	Partner	0	3.00	2,505.00	835.00	3.00	0.00	0.00	0.08000	0	Unbilled	Work on incorporation of revisions suggested by co-counsel to draft Monitoring Report of N. Schaff, M.D. for November 2018 monitoring visit to FCCW, editing of and revisions to same, and follow-up email communications with Compliance Monitor N. Schaff, M.D., regarding matters addressed in Plaintiffs' consolidated comments on draft Monitoring Report regarding Nov. 2018 visit to FCCW.	12/2018
12/11/2018		3747	Howard, Theodore		10010	Partner	0	1.00	835.00	835.00	1.00	0.00	0.00	0.08000	0	Unbilled	Communications with Assistant L. Patricia and Accounting Department regarding payment to Plaintiff's expert witness J. Clark.	12/2018
12/20/2018		3747	Howard, Theodore		10010	Partner	0	0.50	417.50	835.00	0.50	0.00	0.00	0.08000	0	Unbilled	Preparation for and participation in telephone conference with co-counsel B. Casarotto and S. Ellis to discuss planning for possible appeal (1.00); initial review and analysis of Courts' Findings of Fact and Conclusions of Law regarding Contempt.	12/2018
01/02/2019		3747	Howard, Theodore		10010	Partner	0	4.00	3,600.00	900.00	4.00	0.00	0.00	0.08000	0	Unbilled	Please and email communications with co-counsel regarding same (3.00).	12/2018
01/03/2019		3747	Howard, Theodore		10010	Partner	0	2.50	2,250.00	900.00	2.50	0.00	0.00	0.08000	0	Unbilled	Continued initial review and analysis of Court's Findings of Fact and Conclusions of Law resolving Contempt Phase (1.00); participation in telephone conference of all Plaintiffs' counsel regarding Court's decision and next steps (1.50).	12/2018
01/04/2019		3747	Howard, Theodore		10010	Partner	0	2.50	2,250.00	900.00	2.50	0.00	0.00	0.08000	0	Unbilled	Email communications with co-counsel regarding issues as to which Plaintiffs might wish to seek reconsideration of Court's Contempt Phase ruling (1.50); draft e-memo to LAJC volunteer co-counsel T. Ball regarding Prison Litigation Reform Act concerns with Court's decision (1.00).	12/2018
01/09/2019		3747	Howard, Theodore		10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	0.08000	0	Unbilled	Telephone conference with co-counsel S. Ellis regarding efforts to contact opposing counsel E. McNelis to discuss Defendant VDOC's plans for addressing Court's Contempt Phase decision.	12/2019
01/10/2019		3747	Howard, Theodore		10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	0.08000	0	Unbilled	Participation in telephone conference of Plaintiff's Litigation Team regarding flagging and development of issues for Motion for Reconsideration of Court's Contempt Phase decision and draft research request to Firm Library Research Team regarding same.	12/2019
01/11/2019		3747	Howard, Theodore		10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	0.08000	0	Unbilled	Work on drafting of Memorandum in Support of Plaintiff's Motion for Attorney's Fees and Costs (1.50); email exchange with co-counsel regarding applicable measurement period for fee request (50).	12/2019
01/12/2019		3747	Howard, Theodore		10010	Partner	0	2.00	1,800.00	900.00	2.00	0.00	0.00	0.08000	0	Unbilled	Review and analysis of cases yielded by Library Research Staff concerning flagging and development of issues for Motion for Reconsideration of Court's Contempt Phase decision and draft research request to Firm Library Research Team regarding same.	12/2019
01/15/2019		3747	Howard, Theodore		10010	Partner	0	2.50	2,250.00	900.00	2.50	0.00	0.00	0.08000	0	Unbilled	Review and analysis of cases yielded by Library Research Staff concerning flagging and development of issues for Motion for Reconsideration of Court's Contempt Phase decision and draft research request to Firm Library Research Team regarding same.	12/2019
01/17/2019		3747	Howard, Theodore		10010	Partner	0	4.00	3,600.00	900.00	4.00	0.00	0.00	0.08000	0	Unbilled	Support of Plaintiffs' Fee Petition (1.50).	12/2019

Time Report
Billed and Unbilled
Washington Lawyers Committee for Civil / Fluvaria Medical Care Class Action (75459-21)

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Ong Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice	Status	Narrative	Posted
01/18/2019	3747	Howard, Theodore	10010	Partner	0	4.50	4,050.00	900.00	4.50	0.00	0.00	0.00 08000	0	Unbilled	Drafting and submission of Motion to Extend Time to File Attorneys' Fees Petition and communications with co-counsel and opposing counsel E. McNelis regarding same (3:00); continued work on drafting of Memorandum in Support of Petition for Attorneys' Fees (1:00); email communications with co-counsel regarding Court-ordered substitution of Parties concerning identity of current FCCW Medical Director; Dr. P. Torgonski (5:0).	3/2019
01/21/2019	3747	Howard, Theodore	10010	Partner	0	3.00	2,700.00	900.00	3.00	0.00	0.00	0.00 08000	0	Unbilled	Email communications with co-counsel concerning Fee Petition concerning Plaintiffs' pending Motion to Extend Time to File Fee Petition, and updating of co-counsel regarding same.	3/2019
01/22/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	0.00 08000	0	Unbilled	Email communications with Chambers of Mag. Judge J. Hoppe concerning Plaintiffs' Fee Petition (1:00); review of legal research findings provided by K. Swendsen addressing scope of breach of Settlement Agreement remedies available to the Court under Virginia common law and transmittal email to co-counsel regarding same (3:00).	3/2019
01/23/2019	3747	Howard, Theodore	10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	0.00 08000	0	Unbilled	Preparation for and participation in call with Plaintiffs' Litigation Team regarding status of preparation of Plaintiffs' Motion for Reconsideration with respect to certain aspects of Court's Injunction Order and proposed next steps.	3/2019
01/24/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	0.00 08000	0	Unbilled	Email communications with co-counsel A. Turner and Court-appointed Compliance Monitor N. Schaffir, M.D., concerning appointment of Compliance Monitor N. Schaffir, M.D., concerning Americans With Disabilities Act policy for FCCW.	3/2019
01/26/2019	3747	Howard, Theodore	10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	0.00 08000	0	Unbilled	Editing of and revisions to Plaintiffs' Rule 59 Motion for Reconsideration with respect to certain elements of the Court's Injunction Order, drafting of Section of Supporting Memorandum to explain need for inclusion of Settlement Agreement in revised Injunction Order pursuant to Rule 65(d), and emails with co-counsel regarding same (3:30); draft e-memo to Compliance Monitor N. Schaffir, M.D., concerning status of parties' efforts to resolve differences concerning Americans With Disabilities Act operating procedure (1:00).	3/2019
01/27/2019	3747	Howard, Theodore	10010	Partner	0	4.50	4,050.00	900.00	4.50	0.00	0.00	0.00 08000	0	Unbilled	Email communications with Plaintiff's correctional medical expert R. Greminger, M.D., regarding nursing staffing issue arising in connection with Rule 59 Motion for Reconsideration of Injunction Order (1:00); final editing of and revisions to Plaintiff's Motion for Reconsideration and communications with co-counsel regarding same (2:00).	3/2019
01/28/2019	3747	Howard, Theodore	10010	Partner	0	3.00	2,700.00	900.00	3.00	0.00	0.00	0.00 08000	0	Unbilled	Final review and editing of revised drafts of Plaintiff's Rule 59 Motion for Reconsideration, supporting Memorandum and Proposed Order and follow-up email communications with co-counsel regarding same.	3/2019
01/29/2019	3747	Howard, Theodore	10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	0.00 08000	0	Unbilled	Communications with co-counsel regarding final revisions to Rule 59 Motion for Reconsideration (5:0); initial review and analysis of Defendants' Rule 59 filing (5:0).	3/2019
01/30/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	0.00 08000	0	Unbilled	Participation in conference call of Plaintiff's Litigation Team regarding review of Defendants' Rule 59 Motion and identification of arguments responsive to points raised and argued thereon.	3/2019
01/31/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	0.00 08000	0	Unbilled	Review of draft emails to opposing counsel inviting participation in discussions to resolve Contempt Phase attorneys fees and provisions of comments to co-counsel.	4/2019
02/01/2019	3747	Howard, Theodore	10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	0.00 08000	0	Unbilled	Email communication with co-counsel S. Ellis regarding receipt from FCCW of initial reports concerning the detail of FCCW prisoner S. D. Brown.	4/2019
02/08/2019	3747	Howard, Theodore	10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	0.00 08000	0	Unbilled	Initial review and editing of draft of Plaintiff's Memorandum in Opposition to DOC Defendant's Rule 59 Motion to Alter or Amend Judgment and email communications with co-counsel S. Ellis regarding same.	4/2019
02/11/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	0.00 08000	0	Unbilled		

Time Report
 Billed and Unbilled
 Washington Lawyers Committee for Civil / Fluvaria Medical Care Class Action (75459-21)

Date	SM/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice	Status	Narrative	Posted
02/13/2019	3747	Howard, Theodore	10010	Partner	0	3.00	2,700.00	900.00	3.00	0.00	0.00	08000	0	Unbilled	Final editing and revisions to Plaintiff's Opposition to Defendant's Rule 59 Motion to Alter/Amend Judgment and email communications with co-counsel S. Ellis regarding same (1:00); initial review of Defendants' Opposition to Plaintiff's Rule 59 Motion and email communications with co-counsel regarding same (1:00); review of emails exchanged between the parties concerning medical care issues of FCCCW prisoner M. Ryder (1:00).	4/2019
02/14/2019	3747	Howard, Theodore	10010	Partner	0	3.00	2,700.00	900.00	3.00	0.00	0.00	08000	0	Unbilled	Telephone conference with co-counsel to discuss arguments for inclusion in Plaintiff's Reply to Defendants' Opposition to Plaintiff's Rule 59 Motion (50); resumed work on drafting of Memorandum in Support of Plaintiff's Petition for Attorney's Fees and related legal research (2:50).	4/2019
02/15/2019	3747	Howard, Theodore	10010	Partner	0	6.00	5,400.00	900.00	6.00	0.00	0.00	08000	0	Unbilled	Continued drafting of Memorandum of Support of Plaintiff's Petition for Attorney's Fees and related review and analysis of relevant case law.	4/2019
02/18/2019	3747	Howard, Theodore	10010	Partner	0	2.50	2,250.00	900.00	2.50	0.00	0.00	08000	0	Unbilled	Final review of draft of Plaintiff's Reply Memorandum in support of Plaintiff's Rule 59 Motion and email communications with co-counsel S. Ellis regarding same.	4/2019
02/20/2019	3747	Howard, Theodore	10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	08000	0	Unbilled	Transmission to co-counsel S. Ellis of documents received from FCCCW concerning death of prisoner S. Dixon (40); email communications with co-counsel S. Ellis regarding comments on proposed draft letter to VDOC addressing emergency medical care needs of FCCCW prisoner M. Ryder (50).	4/2019
02/21/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000	0	Unbilled	Editing of and revisions to revised draft letter to VDOC concerning emergency medical care needs of FCCCW prisoner M. Ryder and email communications with co-counsel S. Ellis regarding same.	4/2019
02/22/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000	0	Unbilled	Telephone conference with Plaintiff's medical expert R. Greifinger, M.D., concerning contact by Virginia news reporter seeking comment on general state of medical care in VA Dept. of Corrections women's facilities.	4/2019
03/04/2019	3747	Howard, Theodore	10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding urgent medical care issues of FCCCW prisoner M. Ryder and communications with Attorney General's Office concerning same.	5/2019
03/06/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding next steps in addressing medical care issues concerning Plaintiff M. Ryder.	5/2019
03/08/2019	3747	Howard, Theodore	10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel S. Ellis regarding proposed edits and revisions to the draft Declaration of Plaintiff M. Ryder.	5/2019
03/12/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel S. Ellis concerning strategy for moving forward with possible Emergency Motion regarding FCCCW's deficient medical care with respect to Plaintiff M. Ryder.	5/2019
03/14/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel concerning strategy for moving forward with respect to emergency medical care claims on behalf of Plaintiff M. Ryder.	5/2019
03/16/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding proposed emergency motion involving FCCCW's failure to provide life-sustaining medication and medical care to Plaintiff M. Ryder.	5/2019
03/19/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel concerning strategy for moving forward with respect to emergency medical care claims on behalf of Plaintiff M. Ryder.	5/2019
03/20/2019	3747	Howard, Theodore	10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel S. Ellis regarding timing issues with respect to FCCCW's Transmittal of Mortality Review for deceased FCCCW prisoner S. Dixon and follow up communications with VDOC's counsel regarding same.	5/2019
03/22/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000	0	Unbilled	Review of FCCCW's "medical report" concerning treatment status of Plaintiff M. Ryder and email communications with co-counsel S. Ellis concerning proposed next steps.	5/2019
03/29/2019	3747	Howard, Theodore	10010	Partner	0	2.00	1,800.00	900.00	2.00	0.00	0.00	08000	0	Unbilled	Review and editing of revised draft of Emergency Motion papers concerning the urgent medical care needs of Plaintiff M. Ryder and email communications with co-counsel S. Ellis regarding same.	5/2019
04/02/2019	3747	Howard, Theodore	10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding suggested revisions to revised draft of Emergency Motion papers addressing urgent medical care needs to Plaintiff M. Ryder.	5/2019

Time Report
 Billed and Unbilled
 Washington Lawyers Committee for Civil / Fluvarna Medical Care Class Action (7543921)

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Ong Hrs	Ong Att	Ong Rate	Rev Hrs	Rev Att	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
04/04/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000		0	Unbilled	S. Ellis regarding proposed motion on behalf of FCCW prisoner M. Ryder and proposed next steps.	5/2019
04/19/2019	3747	Howard, Theodore	10010	Partner	0	2.00	1800.00	900.00	2.00	0.00	0.00	08000		0	Unbilled	Review and analysis of current draft of motion papers concerning Plaintiff M. Ryder's urgent medical care needs and small communications with co-counsel S. Ellis regarding same.	6/2019
04/25/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000		0	Unbilled	Plaintiff M. Ryder's motion papers concerning Plaintiff M. Ryder and proposed next steps regarding same.	6/2019
04/26/2019	3747	Howard, Theodore	10010	Partner	0	1.50	1350.00	900.00	1.50	0.00	0.00	08000		0	Unbilled	Edits and revisions to revised drafts of motion papers concerning Plaintiff M. Ryder and email communications with co-counsel S. Ellis regarding same.	6/2019
04/29/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000		0	Unbilled	Review of draft Press Release concerning filing of emergency motion on behalf of Plaintiff M. Ryder and email communications of VA.G.'s Office concerning possible global settlement with co-counsel S. Ellis regarding same.	6/2019
05/02/2019	3747	Howard, Theodore	10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	08000		0	Unbilled	Edits and revisions to revised drafts of motion papers concerning Plaintiff M. Ryder and email communications with co-counsel S. Ellis regarding same.	6/2019
04/30/2019	3747	Howard, Theodore	10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	08000		0	Unbilled	Review of draft Press Release concerning filing of emergency motion on behalf of Plaintiff M. Ryder and email communications of VA.G.'s Office concerning possible global settlement with co-counsel S. Ellis regarding same.	6/2019
05/03/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000		0	Unbilled	Position on scheduling of hearing on M. Ryder emergency motion.	6/2019
05/06/2019	3747	Howard, Theodore	10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	08000		0	Unbilled	Exchange of phone messages with opposing counsel V. Pearson or VA.G.'s Office concerning possible global settlement decisions.	6/2019
09/05/2017	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000		0	Unbilled	Telephone conference with V. Pearson of VA Attorney General's Office regarding possible reassessment of the case for settlement purposes, suggested next steps, and email communications with co-counsel regarding same.	6/2019
06/13/2017	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000		0	Unbilled	Email to co-counsel B. Castaneda and S. Ellis concerning VA Attorney General's Office stated renewed interest in exploring Motion for Order to Show Cause Why Defendants Should not be held in contempt.	6/2019
06/14/2017	4600	Jasper-Booker, Whetstone	20210	Legal Assistant	0	4.00	1,100.00	275.00	4.00	0.00	0.00	08000		0	Unbilled	Review and analyze Memorandum of Law in Support of Plaintiff's Motion for Order to Show Cause Why Defendants Should not be held in contempt.	6/2017
06/19/2017	5390	Lynn, Hannah	20410	Project Assistant	0	4.25	892.50	210.00	4.25	0.00	0.00	08000		0	Unbilled	Meeting with R. Williams and T. Howard re Fluvarna and begin Fluvarna medical document review against medical files per T. Howard's request.	7/2017
06/14/2017	5390	Lynn, Hannah	20410	Project Assistant	0	2.25	472.50	210.00	2.25	0.00	0.00	08000		0	Unbilled	Continue Fluvarna medical document review against medical files per T. Howard's request.	7/2017
06/19/2017	5390	Lynn, Hannah	20410	Project Assistant	0	2.75	577.50	210.00	2.75	0.00	0.00	08000		0	Unbilled	Continue Fluvarna medical document review against medical files per T. Howard's request.	7/2017
06/20/2017	5390	Lynn, Hannah	20410	Project Assistant	0	1.50	315.00	210.00	1.50	0.00	0.00	08000		0	Unbilled	Continue Fluvarna medical document review against medical files per T. Howard's request.	7/2017
06/21/2017	5390	Lynn, Hannah	20410	Project Assistant	0	1.75	367.50	210.00	1.75	0.00	0.00	08000		0	Unbilled	Continue Fluvarna medical document review against medical files per T. Howard's request.	7/2017
06/22/2017	5390	Lynn, Hannah	20410	Project Assistant	0	0.75	157.50	210.00	0.75	0.00	0.00	08000		0	Unbilled	Continue Fluvarna medical document review against medical files per T. Howard's request.	7/2017
06/23/2017	5390	Lynn, Hannah	20410	Project Assistant	0	5.75	1,207.50	210.00	5.75	0.00	0.00	08000		0	Unbilled	Continue Fluvarna medical document review against medical files per T. Howard's request.	7/2017
06/25/2017	5390	Lynn, Hannah	20410	Project Assistant	0	4.00	840.00	210.00	4.00	0.00	0.00	08000		0	Unbilled	Continue Fluvarna medical document review against medical files per T. Howard's request.	7/2017
06/26/2017	5390	Lynn, Hannah	20410	Project Assistant	0	5.75	1,207.50	210.00	5.75	0.00	0.00	08000		0	Unbilled	Continue Fluvarna medical document review against medical files per T. Howard's request.	7/2017
06/27/2017	5390	Lynn, Hannah	20410	Project Assistant	0	1.25	262.50	210.00	1.25	0.00	0.00	08000		0	Unbilled	Continue Fluvarna medical document review against medical files per T. Howard's request.	7/2017
07/06/2017	5390	Lynn, Hannah	20410	Project Assistant	0	1.75	367.50	210.00	1.75	0.00	0.00	08000		0	Unbilled	Continue Fluvarna medical document review against medical files per T. Howard's request.	7/2017
07/13/2017	5390	Lynn, Hannah	20410	Project Assistant	0	3.50	735.00	210.00	3.50	0.00	0.00	08000		0	Unbilled	Review Declarations and Medical records per T. Howard's request.	7/2017
07/14/2017	5390	Lynn, Hannah	20410	Project Assistant	0	1.00	210.00	210.00	1.00	0.00	0.00	08000		0	Unbilled	Continue review of medical records and declarations per T. Howard's request.	7/2017
07/18/2018	5390	Lynn, Hannah	20410	Project Assistant	0	1.25	262.50	210.00	1.25	0.00	0.00	08000		0	Unbilled	Attend conference call regarding Relativity Training in preparation for document Production review with P. Michel, T. Howard, and R. Williams.	7/2018
01/26/2018	5390	Lynn, Hannah	20410	Project Assistant	0	2.25	472.50	210.00	2.25	0.00	0.00	08000		0	Unbilled	Review UVa and VCU subpoenas duces tecum and attached medical releases and client list per T. Howard request.	7/2018
01/26/2018	5390	Lynn, Hannah	20410	Project Assistant	0	0.50	105.00	210.00	0.50	0.00	0.00	08000		0	Unbilled	Confer with R. Williams re assignments from Justice for All per T.	7/2018
01/29/2018	5390	Lynn, Hannah	20410	Project Assistant	0	2.50	525.00	210.00	2.50	0.00	0.00	08000		0	Unbilled	Review local court rules for subpoenas, review medical release forms for each inmate, and begin compiling subpoenas per T. Howard's request.	7/2018
01/30/2018	5390	Lynn, Hannah	20410	Project Assistant	0	4.50	945.00	210.00	4.50	0.00	0.00	08000		0	Unbilled	Prepare subpoenas for inmate medical records for UVa and VCU hospitals and organize services per T. Howard's request.	7/2018

Time Report
 Billed and Unbilled
 Washington Lawyers Committee for Civil / Fluvaria Medical Care Class Action (7545921)

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Ong Hrs	Ong Amnt	Ong Rate	Rev Hrs	Rev Amnt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
02/06/2018		5390 Lynn, Hannah	20410 Project Assistant	0	5.75	1,207.50	210.00	5.75	0.00	0.00	0.00	0	Unbilled	Begin production requests and objections summary per T. Howard's request.		2/2018	
02/07/2018		5390 Lynn, Hannah	20410 Project Assistant	0	5.00	1,050.00	210.00	5.00	0.00	0.00	0.00	0	Unbilled	Continue production requests and objections summary per T.		2/2018	
02/08/2018		5390 Lynn, Hannah	20410 Project Assistant	0	4.50	945.00	210.00	4.50	0.00	0.00	0.00	0	Unbilled	Continue production requests and objections summary per T.		2/2018	
02/09/2018		5390 Lynn, Hannah	20410 Project Assistant	0	3.50	735.00	210.00	3.50	0.00	0.00	0.00	0	Unbilled	Franchise Production Requests and Objections summary per T.		2/2018	
02/12/2018		5390 Lynn, Hannah	20410 Project Assistant	0	0.50	105.00	210.00	0.50	0.00	0.00	0.00	0	Unbilled	Howard's request.		2/2018	
02/14/2018		5390 Lynn, Hannah	20410 Project Assistant	0	2.50	525.00	210.00	2.50	0.00	0.00	0.00	0	Unbilled	Howard's request.		2/2018	
02/15/2018		5390 Lynn, Hannah	20410 Project Assistant	0	3.50	735.00	210.00	3.50	0.00	0.00	0.00	0	Unbilled	Howard's request.		2/2018	
02/17/2018		5390 Lynn, Hannah	20410 Project Assistant	0	3.00	630.00	210.00	3.00	0.00	0.00	0.00	0	Unbilled	Howard's request.		2/2018	
03/01/2018		5390 Lynn, Hannah	20410 Project Assistant	0	1.00	210.00	210.00	1.00	0.00	0.00	0.00	0	Unbilled	Howard's request.		3/2018	
03/20/2018		5390 Lynn, Hannah	20410 Project Assistant	0	6.50	1,365.00	210.00	6.50	0.00	0.00	0.00	0	Unbilled	Howard's request.		3/2018	
03/23/2018		5390 Lynn, Hannah	20410 Project Assistant	0	3.50	735.00	210.00	3.50	0.00	0.00	0.00	0	Unbilled	Scan and download medical records; follow up regarding cancellations; find VCU information for subpoenas; locate produced files per T. Howard's request.		3/2018	
03/27/2018		5390 Lynn, Hannah	20410 Project Assistant	0	6.00	1,260.00	210.00	6.00	0.00	0.00	0.00	0	Unbilled	Begin to process production request per T. Howard's request.		4/2018	
03/28/2018		5390 Lynn, Hannah	20410 Project Assistant	0	6.00	1,260.00	210.00	6.00	0.00	0.00	0.00	0	Unbilled	Continue to process production request per T. Howard's request.		4/2018	
03/29/2018		5390 Lynn, Hannah	20410 Project Assistant	0	4.00	840.00	210.00	4.00	0.00	0.00	0.00	0	Unbilled	Continue to process production request per T. Howard's request.		4/2018	
03/30/2018		5390 Lynn, Hannah	20410 Project Assistant	0	3.00	630.00	210.00	3.00	0.00	0.00	0.00	0	Unbilled	Continue to process production request per T. Howard's request.		4/2018	
04/02/2018		5390 Lynn, Hannah	20410 Project Assistant	0	3.00	630.00	210.00	3.00	0.00	0.00	0.00	0	Unbilled	Continue review of 2nd RFP request for responsiveness and production per T. Howard's request; and process check requests for release of inmate medical records from DOC.		5/2018	
04/03/2018		5390 Lynn, Hannah	20410 Project Assistant	0	2.00	420.00	210.00	2.00	0.00	0.00	0.00	0	Unbilled	Continue review of 2nd RFP request for responsiveness and production per T. Howard's request.		5/2018	
04/04/2018		5390 Lynn, Hannah	20410 Project Assistant	0	2.00	420.00	210.00	2.00	0.00	0.00	0.00	0	Unbilled	Continue review of 2nd RFP request for responsiveness and production per T. Howard's request.		5/2018	
04/05/2018		5390 Lynn, Hannah	20410 Project Assistant	0	3.00	630.00	210.00	3.00	0.00	0.00	0.00	0	Unbilled	Continue review of discovery documents for production per T. Howard's request.		4/2018	
04/06/2018		5390 Lynn, Hannah	20410 Project Assistant	0	3.50	735.00	210.00	3.50	0.00	0.00	0.00	0	Unbilled	Submit and process checks for payment to VDOC for medical records per T. Howard's request.		4/2018	
04/09/2018		5390 Lynn, Hannah	20410 Project Assistant	0	6.00	1,280.00	210.00	6.00	0.00	0.00	0.00	0	Unbilled	Continue review of 2nd RFP request for responsiveness and production per T. Howard's request.		5/2018	
04/10/2018		5390 Lynn, Hannah	20410 Project Assistant	0	6.00	1,260.00	210.00	6.00	0.00	0.00	0.00	0	Unbilled	Continue review of 2nd RFP request for responsiveness and production per T. Howard's request.		5/2018	
04/11/2018		5390 Lynn, Hannah	20410 Project Assistant	0	11.00	2,310.00	210.00	11.00	0.00	0.00	0.00	0	Unbilled	Finish review of 2nd RFP request for responsiveness and production per T. Howard's request; coordinate production with P. Michel.		5/2018	
04/12/2018		5390 Lynn, Hannah	20410 Project Assistant	0	5.25	1,102.50	210.00	5.25	0.00	0.00	0.00	0	Unbilled	Create privilege log of unproduced documents per T. Howard's request.		5/2018	
04/13/2018		5390 Lynn, Hannah	20410 Project Assistant	0	6.75	1,417.50	210.00	6.75	0.00	0.00	0.00	0	Unbilled	Review and pull documents for T. Howard's review of privileged documents per his request.		5/2018	
04/14/2018		5390 Lynn, Hannah	20410 Project Assistant	0	1.00	210.00	210.00	1.00	0.00	0.00	0.00	0	Unbilled	Review and sort 3rd production documents for relevancy and privilege per T. Howard's request.		5/2018	
04/15/2018		5390 Lynn, Hannah	20410 Project Assistant	0	2.00	420.00	210.00	2.00	0.00	0.00	0.00	0	Unbilled	Howard's request.		5/2018	
04/17/2018		5390 Lynn, Hannah	20410 Project Assistant	0	3.50	735.00	210.00	3.50	0.00	0.00	0.00	0	Unbilled	Prepare 3rd Production documents for approval; process invoice for VDOC records and check request for transmittal to VDOC.		5/2018	
04/18/2018		5390 Lynn, Hannah	20410 Project Assistant	0	1.50	315.00	210.00	1.50	0.00	0.00	0.00	0	Unbilled	Howard's request.		5/2018	

Time Report
Billed and Unbilled
Washington Lawyers Committee for Civil / Fluvana Medical Care Class Action (7345921)

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Ong Hrs	Ong Amnt	Ong Rate	Rev Hrs	Rev Amnt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
04/20/2018		5390 Lynn, Hanah	20410 Project Assistant	0 3.50 735.00 210.00 3.50 0.00 0.00 08000 0	0	3.50	735.00	210.00	3.50 0.00 0.00 08000 0	0	Unbilled	Create privilege log of 3rd production, and isolate and send documents withheld from 4th RFP to T. Howard for review per his request.		5/2018			
04/24/2018		5390 Lynn, Hanah	20410 Project Assistant	0 4.50 945.00 210.00 4.50 0.00 0.00 08000 0	0	4.50	945.00	210.00	4.50 0.00 0.00 08000 0	0	Unbilled	Chat with A. Croft while she is in office for Scherff deposition; stay late to send out supplemental production via secure send per T. Howard's request.		5/2018			
04/25/2018		5390 Lynn, Hanah	20410 Project Assistant	0 4.00 840.00 210.00 4.00 0.00 0.00 08000 0	0	4.00	840.00	210.00	4.00 0.00 0.00 08000 0	0	Unbilled	Finish privilege log and follow up with VDOC about medical records requests per T. Howard's request.		5/2018			
04/26/2018		5390 Lynn, Hanah	20410 Project Assistant	0 3.00 630.00 210.00 3.00 0.00 0.00 08000 0	0	3.00	630.00	210.00	3.00 0.00 0.00 08000 0	0	Unbilled	Review and sort inmate medical records in preparation for production per T. Howard's request.		5/2018			
04/27/2018		5390 Lynn, Hanah	20410 Project Assistant	0 2.00 420.00 210.00 2.00 0.00 0.00 08000 0	0	2.00	420.00	210.00	2.00 0.00 0.00 08000 0	0	Unbilled	Begin document listing of produced documents in preparation for Continue naming files in excel document for LAJC review per T. Howard's request.		5/2018			
05/01/2018		5390 Lynn, Hanah	20410 Project Assistant	0 1.50 315.00 210.00 1.50 0.00 0.00 08000 0	0	1.50	315.00	210.00	1.50 0.00 0.00 08000 0	0	Unbilled	Continue naming files in excel sheet for review per LAJC's request per T. Howard's request.		5/2018			
05/02/2018		5390 Lynn, Hanah	20410 Project Assistant	0 4.50 945.00 210.00 4.50 0.00 0.00 08000 0	0	4.50	945.00	210.00	4.50 0.00 0.00 08000 0	0	Unbilled	Further coordinate Donna Reed Death Records, and send relatively information to local counsel per T. Howard's request.		5/2018			
05/04/2018		5390 Lynn, Hanah	20410 Project Assistant	0 0.25 52.50 210.00 0.25 0.00 0.00 08000 0	0	0.25	52.50	210.00	0.25 0.00 0.00 08000 0	0	Unbilled	Process and send out checks for inmate medical records per T. Howard's request.		5/2018			
05/07/2018		5390 Lynn, Hanah	20410 Project Assistant	0 1.75 367.50 210.00 1.75 0.00 0.00 08000 0	0	1.75	367.50	210.00	1.75 0.00 0.00 08000 0	0	Unbilled	Unbilled		5/2018			
05/16/2018		5390 Lynn, Hanah	20410 Project Assistant	0 6.50 1,385.00 210.00 6.50 0.00 0.00 08000 0	0	6.50	1,385.00	210.00	6.50 0.00 0.00 08000 0	0	Unbilled	Unbilled		5/2018			
05/18/2018		5390 Lynn, Hanah	20410 Project Assistant	0 6.50 1,385.00 210.00 6.50 0.00 0.00 08000 0	0	6.50	1,385.00	210.00	6.50 0.00 0.00 08000 0	0	Unbilled	General trial prep per T. Howard's request.		5/2018			
05/22/2018		5390 Lynn, Hanah	20410 Project Assistant	0 6.00 1,280.00 210.00 6.00 0.00 0.00 08000 0	0	6.00	1,280.00	210.00	6.00 0.00 0.00 08000 0	0	Unbilled	Unbilled		5/2018			
05/23/2018		5390 Lynn, Hanah	20410 Project Assistant	0 4.50 945.00 210.00 4.50 0.00 0.00 08000 0	0	4.50	945.00	210.00	4.50 0.00 0.00 08000 0	0	Unbilled	Florida trial prep.		5/2018			
05/24/2018		5390 Lynn, Hanah	20410 Project Assistant	0 0 0.00 210.00 0.00 0.00 0.00 08000 0	0	0	0.00	210.00	0.00 0.00 0.00 08000 0	0	Unbilled	Assist T. forward with preparing and filing pretrial brief per his request.		5/2018			
05/29/2018		5390 Lynn, Hanah	20410 Project Assistant	0 12.00 2,550.00 210.00 12.00 0.00 0.00 08000 0	0	12.00	2,550.00	210.00	12.00 0.00 0.00 08000 0	0	Unbilled	Florida trial prep.		5/2018			
05/31/2018		5390 Lynn, Hanah	20410 Project Assistant	0 7.50 1,575.00 210.00 7.50 0.00 0.00 08000 0	0	7.50	1,575.00	210.00	7.50 0.00 0.00 08000 0	0	Unbilled	General preparations for trial, pulling files, etc.		5/2018			
06/01/2018		5390 Lynn, Hanah	20410 Project Assistant	0 6.50 1,385.00 210.00 6.50 0.00 0.00 08000 0	0	6.50	1,385.00	210.00	6.50 0.00 0.00 08000 0	0	Unbilled	General preparations for trial, pulling files, etc.		5/2018			
06/04/2018		5390 Lynn, Hanah	20410 Project Assistant	0 5.50 1,385.00 210.00 5.50 0.00 0.00 08000 0	0	5.50	1,385.00	210.00	5.50 0.00 0.00 08000 0	0	Unbilled	General preparations for trial, pulling files, etc.		5/2018			
06/05/2018		5390 Lynn, Hanah	20410 Project Assistant	0 7.50 1,575.00 210.00 7.50 0.00 0.00 08000 0	0	7.50	1,575.00	210.00	7.50 0.00 0.00 08000 0	0	Unbilled	General preparations for trial, pulling files, etc.		5/2018			
06/06/2018		5390 Lynn, Hanah	20410 Project Assistant	0 4.50 945.00 210.00 4.50 0.00 0.00 08000 0	0	4.50	945.00	210.00	4.50 0.00 0.00 08000 0	0	Unbilled	General preparations for trial, pulling files, etc.		5/2018			
06/07/2018		5390 Lynn, Hanah	20410 Project Assistant	0 8.75 1,837.50 210.00 8.75 0.00 0.00 08000 0	0	8.75	1,837.50	210.00	8.75 0.00 0.00 08000 0	0	Unbilled	General preparations for trial, pulling files, etc.		5/2018			
		Lynn, Hanah		Total		285.00	59,850.00	285.00	0.00								
12/18/2017		5693 Michel, Paul	20710 eDiscovery Specialist	0 1.50 487.50 325.00 1.50 0.00 0.00 08000 0	0	1.50	487.50	325.00	1.50 0.00 0.00 08000 0	0	Unbilled	Per request of Ms. Williams, consulted with legal team on production spec and opposing counsel demands regarding same.		12/2017			
12/20/2017		5693 Michel, Paul	20710 eDiscovery Specialist	0 2.50 812.50 325.00 2.50 0.00 0.00 08000 0	0	2.50	812.50	325.00	2.50 0.00 0.00 08000 0	0	Unbilled	Per request of Ms. Williams, participated in conference call with legal team and opposing counsel. Prepared revised specs for productions based on call. Consulted with legal team on format for e-mail productions.		12/2017			
12/27/2017		5693 Michel, Paul	20710 eDiscovery Specialist	0 1.50 487.50 325.00 1.50 0.00 0.00 08000 0	0	1.50	487.50	325.00	1.50 0.00 0.00 08000 0	0	Unbilled	Per request of Ms. Williams, consult with legal team on production specifications.		12/2017			
12/29/2017		5693 Michel, Paul	20710 eDiscovery Specialist	0 3.00 975.00 325.00 3.00 0.00 0.00 08000 0	0	3.00	975.00	325.00	3.00 0.00 0.00 08000 0	0	Unbilled	Per request of Ms. Williams, consult with legal team on production objections to proposed specifications.		12/2017			
01/02/2018		5693 Michel, Paul	20710 eDiscovery Specialist	0 3.50 1,137.50 325.00 3.50 0.00 0.00 08000 0	0	3.50	1,137.50	325.00	3.50 0.00 0.00 08000 0	0	Unbilled	Per request of Ms. Williams, consult with legal team and producing party on errors in the first production volume from opposing counsel, and remaining issues on production volume from opposing counsel.		12/2018			
01/05/2018		5693 Michel, Paul	20710 eDiscovery Specialist	0 1.50 487.50 325.00 1.50 0.00 0.00 08000 0	0	1.50	487.50	325.00	1.50 0.00 0.00 08000 0	0	Unbilled	Per request of Ms. Williams, consult with legal team and producing party on errors in the first production volume from opposing counsel.		12/2018			
01/07/2018		5693 Michel, Paul	20710 eDiscovery Specialist	0 2.50 812.50 325.00 2.50 0.00 0.00 08000 0	0	2.50	812.50	325.00	2.50 0.00 0.00 08000 0	0	Unbilled	Per request of Ms. Williams, consult with legal team and producing party on errors in the first production volume from opposing counsel.		12/2018			
01/11/2018		5693 Michel, Paul	20710 eDiscovery Specialist	0 3.50 1,137.50 325.00 3.50 0.00 0.00 08000 0	0	3.50	1,137.50	325.00	3.50 0.00 0.00 08000 0	0	Unbilled	Per request of Ms. Williams, consult with legal team and producing party on errors in the first production volume from opposing counsel.		12/2018			
01/12/2018		5693 Michel, Paul	20710 eDiscovery Specialist	0 4.00 1,300.00 325.00 4.00 0.00 0.00 08000 0	0	4.00	1,300.00	325.00	4.00 0.00 0.00 08000 0	0	Unbilled	Per request of Ms. Williams, consult with legal team and producing party on errors in the first production volume from opposing counsel.		12/2018			
01/16/2018		5693 Michel, Paul	20710 eDiscovery Specialist	0 3.00 975.00 325.00 3.00 0.00 0.00 08000 0	0	3.00	975.00	325.00	3.00 0.00 0.00 08000 0	0	Unbilled	Per request of Ms. Williams, consult with legal team and producing party on errors in the first production volume from opposing counsel.		12/2018			
01/18/2018		5693 Michel, Paul	20710 eDiscovery Specialist	0 4.00 1,300.00 325.00 4.00 0.00 0.00 08000 0	0	4.00	1,300.00	325.00	4.00 0.00 0.00 08000 0	0	Unbilled	Per request of Ms. Williams, consult with legal team and producing party on errors in the first production volume from opposing counsel.		12/2018			
01/23/2018		5693 Michel, Paul	20710 eDiscovery Specialist	0 4.50 1,482.50 325.00 4.50 0.00 0.00 08000 0	0	4.50	1,482.50	325.00	4.50 0.00 0.00 08000 0	0	Unbilled	Per request of Ms. Williams, consult with legal team and producing party on errors in the first production volume from opposing counsel.		12/2018			
01/25/2018		5693 Michel, Paul	20710 eDiscovery Specialist	0 4.50 1,482.50 325.00 4.50 0.00 0.00 08000 0	0	4.50	1,482.50	325.00	4.50 0.00 0.00 08000 0	0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review.		12/2018			
		5693 Michel, Paul	20710 eDiscovery Specialist	0 4.50 1,482.50 325.00 4.50 0.00 0.00 08000 0	0	4.50	1,482.50	325.00	4.50 0.00 0.00 08000 0	0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review, including preparing request numbers and descriptions for same.		12/2018			

Time Report
Billed and Unbilled
Washington Lawyers Committee for Civil / Fluvaria Medical Care Class Action (7343921)

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Ong Hrs	Ong Amt	Ong Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice Status	Narrative	Posted	
01/26/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review, including preparing request numbers and descriptions for same.	1/2018
01/29/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review, including preparing request numbers and descriptions for same.	1/2018
01/30/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, coordinate addition of internal materials to review for eventual production. Continue preparing production volumes from opposing counsel for review.	1/2018
01/31/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review, including preparing request numbers and descriptions for same.	1/2018
02/01/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare production of internal materials and coordinate delivery of same to expert reviewer.	1/2018
02/05/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review, including preparing request numbers and descriptions for same.	1/2018
02/06/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review, including preparing request numbers and descriptions for same.	1/2018
02/07/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, continue preparing production volumes from opposing counsel for review.	1/2018
02/08/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.00	975.00	325.00	3.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, continue preparing production volumes from opposing counsel for review.	1/2018
02/09/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.00	975.00	325.00	3.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, continue preparing production volumes from opposing counsel for review.	1/2018
02/12/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, coordinate addition of internal materials to review for eventual production. Continue preparing production volumes from opposing counsel for review.	1/2018
02/13/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, continue preparing production volumes from opposing counsel for review.	1/2018
02/14/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, coordinate addition of internal materials to review for eventual production. Continue preparing production volumes from opposing counsel for review.	1/2018
02/15/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, continue preparing production volumes from opposing counsel for review.	1/2018
02/16/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,390.00	325.00	4.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare new opposing counsel production to review. Prepare production volumes of selected materials in agreed upon format for expert review and potential production to opposing counsel.	1/2018
02/20/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare new opposing counsel production for review. Prepare production volumes for review and coordinate delivery of same.	1/2018
02/22/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare new opposing counsel production for review.	1/2018
02/23/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare new opposing counsel production for review.	1/2018
02/26/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	1.50	487.50	325.00	1.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare new opposing counsel production for review. Consult with legal team on document review.	1/2018
02/27/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Prepare new opposing counsel production for review.	1/2018
02/28/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, coordinate preparation of internal materials for future production. Prepare new opposing counsel production for review.	1/2018
03/01/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,390.00	325.00	4.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare documents for production in agreed upon format. Prepare new opposing counsel production for review.	1/2018
03/05/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,390.00	325.00	4.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Prepare new opposing counsel production for review.	1/2018
03/06/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Prepare new opposing counsel production for review.	1/2018
03/07/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, coordinate preparation of internal materials for review in preparation for production. Prepare	1/2018

Time Report
Billed and Unbilled
Washington Lawyers Committee for Civil / Fluvaria Medical Care Class Action (75459-21)

Date	SMT	task	Attorney Name	Staff Level	Description	Rate	Ong Hrs	Ong Amt	Ong Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
03/08/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare document production in agreed upon format. Prepare opposing counsel production in volume to review.	3/2018
03/09/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare document production in agreed upon format. Prepare and send production volumes to agreed upon format. Prepare and send production volumes to agreed upon format. Consult with legal team on document review.	3/2018
03/12/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, coordinate preparation of new materials for attorney review. Consult with legal team on document review.	3/2018
03/13/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare document production in agreed upon format. Consult with legal team on document review.	3/2018
03/14/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare document production in agreed upon format. Prepare third party production for attorney review.	3/2018
03/15/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare document exports for attorney review. Coordinate imaging of documents in preparation for production. Prepare document readiness for legal team use.	3/2018
03/16/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare document production in agreed upon format. Prepare third party production for attorney review.	3/2018
03/19/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare document production in agreed upon format. Prepare same for delivery to opposing counsel.	3/2018
03/22/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare documents for production in agreed upon format.	3/2018
03/26/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, gather and organize internal materials to facilitate legal assistant review prior to possible production. Prepare opposing counsel production volumes for review.	3/2018
03/27/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, gather and organize internal materials to facilitate legal assistant review prior to possible production. Prepare opposing counsel production volumes for review.	3/2018
03/28/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare internal materials for production in agreed upon format.	3/2018
03/29/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare third party production for review.	3/2018
03/30/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	5.50	1,787.50	325.00	5.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, prepare third party production for review.	3/2018
04/02/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Prepare opposing counsel production for review.	4/2018
04/03/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Prepare opposing counsel production for review.	4/2018
04/04/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Prepare opposing counsel production for review.	4/2018
04/05/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Prepare opposing counsel production for review.	4/2018
04/06/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for legal assistant review.	4/2018
04/09/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, coordinate scanning of paper materials for attorney review. Organize internal materials for legal assistant review. Prepare opposing counsel production for review.	4/2018
04/10/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, coordinate scanning of paper materials for attorney review. Organize internal materials for legal assistant review. Prepare opposing counsel production for review.	4/2018
04/11/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, organize internal materials for legal assistant review. Prepare production of internal materials in agreed upon format. Consult with legal team on document review.	4/2018
04/12/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	2.00	650.00	325.00	2.00	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for legal assistant review. Prepare opposing counsel production for review.	4/2018
04/13/2018			5693 Michel, Paul	20710	eDiscovery Specialist	0	2.00	650.00	325.00	2.00	0.00	0.00	0.00	0.00	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for legal assistant review. Prepare opposing counsel production for review.	4/2018

Time Report
Billed and Unbilled
Washington Lawyers Committee for Civil / Fluvaria Medical Care Class Action (7345921)

Date	SM/Task	Attorney Name	Staff Level	Description	Rate	Ong Hrs	Ong Amt	Ong Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
04/16/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, coordinate sending of materials for review to experts. Consult with legal team on document review.	4/2018	
04/17/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.25	1,381.25	325.00	4.25	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, coordinate sending of materials for review to experts. Consult with legal team on document review.	4/2018	
04/18/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.00	975.00	325.00	3.00	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	4/2018	
04/19/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	4/2018	
04/20/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	4/2018	
04/23/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	4/2018	
04/24/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	4/2018	
04/25/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	4/2018	
04/26/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	4/2018	
04/27/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	4/2018	
04/30/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	4/2018	
05/01/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018	
05/02/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018	
05/03/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018	
05/04/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018	
05/07/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018	
05/08/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018	
05/09/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018	
05/10/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018	
05/11/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000	0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018	

Time Report
 Billed and Unbilled
 Washington Lawyers Committee for Civil / Fluvanna Medical Care Class Action (73439-21)

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice Status	Narrative	Posted
05/14/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/15/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.00	975.00	325.00	3.00	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/16/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.00	975.00	325.00	3.00	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/17/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/18/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/21/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/22/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/23/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	1.00	325.00	325.00	1.00	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/24/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/25/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/29/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/30/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/31/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
06/01/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
06/04/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
06/05/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
06/06/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	5.00	1,625.00	325.00	5.00	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
06/07/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
06/08/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.00	975.00	325.00	3.00	0.00	0.00	0.00	0.00	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018

Time Report
Billed and Unbilled
Washington Lawyers Committee for Civil / Fluvanna Medical Care Class Action (75459-21)

Date	SMT/Task	Attorney Name	Staff Level	Description	Rate	Ong Hrs	Ong Amt	Ong Rate	Rev Hrs	Rev Amt	Rev Rate	Service Activity	Invoice Status	Narrative	Posted	
06/11/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	0.00	0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	6/2018
06/12/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	0.00	0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	6/2018
06/13/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	0.00	0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	6/2018
06/14/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	2.00	650.00	325.00	2.00	0.00	0.00	0.00	0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	6/2018
06/15/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	0.00	0	Unbilled	Per request of Mr. Howard, begin preparations for new database records for co-counsel review	6/2018
06/08/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	1.50	487.50	325.00	1.50	0.00	0.00	0.00	0	Unbilled	Per request of Mr. Howard, search for and prepare medical records for co-counsel review	6/2018
		Michel, Paul	Total			386.25	125,531.25		386.25	0.00	0.00	0.00	0	Billed	Confer with Mr. Howard re research issue.	6/2019
01/15/2019		8258 Swendsbøe, Krystal	10110	Associate	0	0.30	185.50	555.00	0.30	0.00	0.00	0.00	0	Unbilled	Confer with Mr. Howard re research issue.	2/2019
01/15/2019		8258 Swendsbøe, Krystal	10110	Associate	0	0.30	189.00	530.00	0.30	0.00	0.00	0.00	0	Billed	Research stat law question, draft summary of research.	2/2019
01/19/2019		8258 Swendsbøe, Krystal	10110	Associate	0	0.30	186.50	555.00	0.30	0.00	0.00	0.00	0	Unbilled	Research stat law question, draft summary of research.	2/2019
01/19/2019		8258 Swendsbøe, Krystal	10110	Associate	0	0.20	1,180.00	630.00	0.20	0.00	0.00	0.00	0	Billed	Research stat law question, draft summary of research.	2/2019
01/23/2019		8258 Swendsbøe, Krystal	10110	Associate	0	0.20	1,260.00	630.00	0.20	0.00	0.00	0.00	0	Unbilled	Research injunction issue, draft summary re same, confer with Mr. Howard.	1/2019
06/12/2017		9406 Williams, Rachel	20410	Project Assistant	0	1.50	430.00	2,709.00	4.30	0.00	0.00	0.00	0	Unbilled	Worked with IS department to gain access to extranet.	6/2017
06/13/2017		9406 Williams, Rachel	20410	Project Assistant	0	6.50	1,332.50	205.00	6.50	0.00	0.00	0.00	0	Unbilled	Conference with Mr. Howard and Ms. Lynn regarding needs in the case; Reviewed opinion and settlement agreement for case background; Coordinated access to extranet and necessary document files and began initial review of files.	6/2017
06/20/2017		9406 Williams, Rachel	20410	Project Assistant	0	4.50	922.50	205.00	4.50	0.00	0.00	0.00	0	Unbilled	Continued review of declarations and medical records.	6/2017
06/22/2017		9406 Williams, Rachel	20410	Project Assistant	0	7.50	1,537.50	205.00	7.50	0.00	0.00	0.00	0	Unbilled	Continued review of inmate medical records for discrepancies.	6/2017
06/23/2017		9406 Williams, Rachel	20410	Project Assistant	0	6.00	1,230.00	205.00	6.00	0.00	0.00	0.00	0	Unbilled	Continued to review medical files and claimant declarations.	6/2017
06/25/2017		9406 Williams, Rachel	20410	Project Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	0.00	0	Unbilled	Continued review of declarations and medical files.	6/2017
06/26/2017		9406 Williams, Rachel	20210	Legal Assistant	0	4.50	922.50	205.00	4.50	0.00	0.00	0.00	0	Unbilled	Completed initial review of medical files of inmates.	7/2017
06/27/2017		9406 Williams, Rachel	20210	Legal Assistant	0	3.00	615.00	205.00	3.00	0.00	0.00	0.00	0	Unbilled	Conference with Mr. Howard and Miss Flynn regarding document review findings and began follow up research.	7/2017
06/28/2017		9406 Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	0.00	0	Unbilled	Completed updated review of prison records.	7/2017
06/30/2017		9406 Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	0.00	0	Unbilled	Review newly updated records and responses from co-counsel regarding earlier raised concerns.	7/2017
1/12/2017		9406 Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	0.00	0	Unbilled	Phone Conference regarding discovery staffing needs for matter; conference with practice support regarding migration to relatively database.	1/12/2017
1/12/2017		9406 Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	0.00	0	Unbilled	Conference with Legal support regarding attorney general response to document production protocol; Coordination with Mr. T. Howard to plan next steps in reponse to attorney general's request for production accommodations.	1/12/2017
1/21/2017		9406 Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	0.00	0	Unbilled	Coordination with team regarding upcoming call with opposing counsel regarding production specification requirements and requests.	1/2017
1/21/2017		9406 Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	0.00	0	Unbilled	Conference with Legal support regarding attorney general response to document production protocol; Coordination with Mr. T. Howard to plan next steps in reponse to attorney general's request for production accommodations.	1/2017
1/22/2017		9406 Williams, Rachel	20210	Legal Assistant	0	1.50	307.50	205.00	1.50	0.00	0.00	0.00	0	Unbilled	Conference with Mr. Howard, Co-counsel and office of the Attorney General of Virginia regarding compromises for the document production protocol and follow up with Mr. Michel to determine possible needs in light of conversation.	1/2017
1/22/2017		9406 Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	0.00	0	Unbilled	Review of OAG IT department revisions of production specifications.	1/2017
1/22/2017		9406 Williams, Rachel	20210	Legal Assistant	0	4.50	922.50	205.00	4.50	0.00	0.00	0.00	0	Unbilled	Conference with team regarding OAG office's alteration of production specification agreement and research regarding potential impacts of requested changes.	1/2017
12/29/2017		9406 Williams, Rachel	20210	Legal Assistant	0	5.00	1,025.00	205.00	5.00	0.00	0.00	0.00	0	Unbilled	Enables regarding questions for opposing counsel and potential areas of compromise for rolling production request. Make edits to production protocol regarding needs and clarifying statements by opposing counsel and discussion of potential impact should they fail to agree to our proposed requirements.	12/2017

EXHIBIT 2

LAFFEY MATRIX

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/01/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/01/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/01/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/01/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/01/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/01/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/01/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/01/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/01/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/01/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been set forth in the Laffey Matrix, 123 F. Supp. 2d 8 (D.D.C. 2000).

* "Years Out of Law School" is calculated from June 1 of each year, when most law students graduate. "1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). "4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier "1-3" from June 1, 1996 until May 31, 1999, would move into tier "4-7" on June 1, 1999, and tier "8-10" on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT 3

USAO ATTORNEY'S FEES MATRIX — 2015-2019

Revised Methodology starting with 2015-2016 Year

Years (Hourly Rate for June 1 – May 31, based on change in PPI-OL since January 2011)

Experience	2015-16	2016-17	2017-18	2018-19
31+ years	568	581	602	613
21-30 years	530	543	563	572
16-20 years	504	516	536	544
11-15 years	455	465	483	491
8-10 years	386	395	410	417
6-7 years	332	339	352	358
4-5 years	325	332	346	351
2-3 years	315	322	334	340
Less than 2 years	284	291	302	307
Paralegals & Law Clerks	154	157	164	166

Explanatory Notes

1. This matrix of hourly rates for attorneys of varying experience levels and paralegals/law clerks has been prepared by the Civil Division of the United States Attorney's Office for the District of Columbia (USAO) to evaluate requests for attorney's fees in civil cases in District of Columbia courts. The matrix is intended for use in cases in which a fee-shifting statute permits the prevailing party to recover "reasonable" attorney's fees. *See, e.g.*, 42 U.S.C. § 2000e-5(k) (Title VII of the 1964 Civil Rights Act); 5 U.S.C. § 552(a)(4)(E) (Freedom of Information Act); 28 U.S.C. § 2412(b) (Equal Access to Justice Act). The matrix has not been adopted by the Department of Justice generally for use outside the District of Columbia, or by other Department of Justice components, or in other kinds of cases. The matrix does **not** apply to cases in which the hourly rate is limited by statute. *See* 28 U.S.C. § 2412(d).
2. A "reasonable fee" is a fee that is sufficient to attract an adequate supply of capable counsel for meritorious cases. *See, e.g.*, *Perdue v. Kenny A. ex rel. Winn*, 559 U.S. 542, 552 (2010). Consistent with that definition, the hourly rates in the above matrix were calculated from average hourly rates reported in 2011 survey data for the D.C. metropolitan area, which rates were adjusted for inflation with the Producer Price Index-Office of Lawyers (PPI-OL) index. The survey data comes from ALM Legal Intelligence's 2010 & 2011 Survey of Law Firm Economics. The PPI-OL index is available at <http://www.bls.gov/ppi>. On that page, under "PPI Databases," and "Industry Data (Producer Price Index - PPI)," select either "one screen" or "multi-screen" and in the resulting window use "industry code" 541110 for "Offices of Lawyers" and "product code" 541110541110 for "Offices of Lawyers." The average hourly rates from the 2011 survey data are multiplied by the PPI-OL index for May in the year of the update, divided by 176.6, which is the PPI-OL index for January 2011, the month of the survey data, and then rounding to the nearest whole dollar (up if remainder is 50¢ or more).
3. The PPI-OL index has been adopted as the inflator for hourly rates because it better reflects the mix of legal services that law firms collectively offer, as opposed to the legal services that typical consumers use, which is what the CPI-

Legal Services index measures. Although it is a national index, and not a local one, *cf. Eley v. District of Columbia*, 793 F.3d 97, 102 (D.C. Cir. 2015) (noting criticism of national inflation index), the PPI-OL index has historically been generous relative to other possibly applicable inflation indexes, and so its use should minimize disputes about whether the inflator is sufficient.

4. The methodology used to compute the rates in this matrix replaces that used prior to 2015, which started with the matrix of hourly rates developed in *Laffey v. Northwest Airlines, Inc.* 572 F. Supp. 354 (D.D.C. 1983), *aff'd in part, rev'd in part on other grounds*, 746 F.2d 4 (D.C. Cir. 1984), *cert. denied*, 472 U.S. 1021 (1985), and then adjusted those rates based on the Consumer Price Index for All Urban Consumers (CPI-U) for the Washington-Baltimore (DC-MD-VA-WV) area. Because the USAO rates for the years 2014-15 and earlier have been generally accepted as reasonable by courts in the District of Columbia, *see note 9 below*, the USAO rates for those years will remain the same as previously published on the USAO's public website. That is, the USAO rates for years prior to and including 2014-15 remain based on the prior methodology, *i.e.*, the original *Laffey* Matrix updated by the CPI-U for the Washington-Baltimore area. *See Citizens for Responsibility & Ethics in Washington v. Dep't of Justice*, 142 F. Supp. 3d 1 (D.D.C. 2015) and Declaration of Dr. Laura A. Malowane filed therein on Sept. 22, 2015 (Civ. Action No. 12-1491, ECF No. 46-1) (confirming that the USAO rates for 2014-15 computed using prior methodology are reasonable).
5. Although the USAO will not issue recalculated *Laffey* Matrices for past years using the new methodology, it will not oppose the use of that methodology (if properly applied) to calculate reasonable attorney's fees under applicable fee-shifting statutes for periods prior to June 2015, provided that methodology is used consistently to calculate the entire fee amount. Similarly, although the USAO will no longer issue an updated *Laffey* Matrix computed using the prior methodology, it will not oppose the use of the prior methodology (if properly applied) to calculate reasonable attorney's fees under applicable fee-shifting statutes for periods after May 2015, provided that methodology is used consistently to calculate the entire fee amount.
6. The various "brackets" in the column headed "Experience" refer to the attorney's years of experience practicing law. Normally, an attorney's experience will be calculated starting from the attorney's graduation from law school. Thus, the "Less than 2 years" bracket is generally applicable to attorneys in their first and second years after graduation from law school, and the "2-3 years" bracket generally becomes applicable on the second anniversary of the attorney's graduation (*i.e.*, at the beginning of the third year following law school). *See Laffey*, 572 F. Supp. at 371. An adjustment may be necessary, however, if the attorney's admission to the bar was significantly delayed or the attorney did not otherwise follow a typical career progression. *See, e.g., EPIC v. Dep't of Homeland Sec.*, 999 F. Supp. 2d 61, 70-71 (D.D.C. 2013) (attorney not admitted to bar compensated at "Paralegals & Law Clerks" rate); *EPIC v. Dep't of Homeland Sec.*, 982 F. Supp. 2d 56, 60-61 (D.D.C. 2013) (same). The various experience levels were selected by relying on the levels in the ALM Legal Intelligence 2011 survey data. Although finer gradations in experience level might yield different estimates of market rates, it is important to have statistically sufficient sample sizes for each experience level. The experience categories in the current USAO Matrix are based on statistically significant sample sizes for each experience level.
7. ALM Legal Intelligence's 2011 survey data does not include rates for paralegals and law clerks. Unless and until reliable survey data about actual paralegal/law clerk rates in the D.C. metropolitan area become available, the USAO will compute the hourly rate for Paralegals & Law Clerks using the most recent historical rate from the USAO's former *Laffey* Matrix (*i.e.*, \$150 for 2014-15) updated with the PPI-OL index. The formula is \$150 multiplied by the PPI-OL index for May in the year of the update, divided by 194.3 (the PPI-OL index for May 2014), and then rounding to the nearest whole dollar (up if remainder is 50¢ or more).
8. The USAO anticipates periodically revising the above matrix if more recent reliable survey data becomes available, especially data specific to the D.C. market, and in the interim years updating the most recent survey data with the PPI-OL index, or a comparable index for the District of Columbia if such a locality-specific index becomes available.
9. Use of an updated *Laffey* Matrix was implicitly endorsed by the Court of Appeals in *Save Our Cumberland Mountains v. Hodel*, 857 F.2d 1516, 1525 (D.C. Cir. 1988) (en banc). The Court of Appeals subsequently stated that parties may rely on the updated *Laffey* Matrix prepared by the USAO as evidence of prevailing market rates for litigation counsel in the Washington, D.C. area. *See Covington v. District of Columbia*, 57 F.3d 1101, 1105 & n.14, 1109 (D.C. Cir. 1995), *cert. denied*, 516 U.S. 1115 (1996). Most lower federal courts in the District of Columbia

have relied on the USAO's *Laffey* Matrix, rather than the so-called "Salazar Matrix" (also known as the "LSI Matrix" or the "Enhanced *Laffey* Matrix"), as the "benchmark for reasonable fees" in this jurisdiction. *Miller v. Holzmann*, 575 F. Supp. 2d 2, 18 n.29 (D.D.C. 2008) (quoting *Pleasants v. Ridge*, 424 F. Supp. 2d 67, 71 n.2 (D.D.C. 2006)); see, e.g., *Joaquin v. Friendship Pub. Charter Sch.*, 188 F. Supp. 3d 1 (D.D.C. 2016); *Prunty v. Vivendi*, 195 F. Supp. 3d 107 (D.D.C. 2016); *CREW v. U.S. Dep't of Justice*, 142 F. Supp. 3d 1 (D.D.C. 2015); *McAllister v. District of Columbia*, 21 F. Supp. 3d 94 (D.D.C. 2014); *Embassy of Fed. Republic of Nigeria v. Ugwuonye*, 297 F.R.D. 4, 15 (D.D.C. 2013); *Berke v. Bureau of Prisons*, 942 F. Supp. 2d 71, 77 (D.D.C. 2013); *Fisher v. Friendship Pub. Charter Sch.*, 880 F. Supp. 2d 149, 154-55 (D.D.C. 2012); *Sykes v. District of Columbia*, 870 F. Supp. 2d 86, 93-96 (D.D.C. 2012); *Heller v. District of Columbia*, 832 F. Supp. 2d 32, 40-49 (D.D.C. 2011); *Hayes v. D.C. Public Schools*, 815 F. Supp. 2d 134, 142-43 (D.D.C. 2011); *Queen Anne's Conservation Ass'n v. Dep't of State*, 800 F. Supp. 2d 195, 200-01 (D.D.C. 2011); *Woodland v. Viacom, Inc.*, 255 F.R.D. 278, 279-80 (D.D.C. 2008); *American Lands Alliance v. Norton*, 525 F. Supp. 2d 135, 148-50 (D.D.C. 2007). But see, e.g., *Salazar v. District of Columbia*, 123 F. Supp. 2d 8, 13-15 (D.D.C. 2000). Since initial publication of the instant USAO Matrix in 2015, numerous courts similarly have employed the USAO Matrix rather than the *Salazar* Matrix for fees incurred since 2015. E.g., *Electronic Privacy Information Center v. United States Drug Enforcement Agency*, 266 F. Supp. 3d 162, 171 (D.D.C. 2017) ("After examining the case law and the supporting evidence offered by both parties, the Court is persuaded that the updated USAO matrix, which covers billing rates from 2015 to 2017, is the most suitable choice here.") (requiring re-calculation of fees that applicant had computed according to *Salazar* Matrix); *Clemente v. FBI*, No. 08-1252 (BJR) (D.D.C. Mar. 24, 2017), 2017 WL 3669617, at *5 (applying USAO Matrix, as it is "based on much more current data than the *Salazar* Matrix"); *Gatore v. United States Dep't of Homeland Security*, 286 F. Supp. 3d 25, 37 (D.D.C. 2017) (although plaintiff had submitted a "great deal of evidence regarding [the] prevailing market rates for complex federal litigation" to demonstrate that its requested [*Salazar*] rates are entitled to a presumption of reasonableness, . . . the Court nonetheless concludes that the defendant has rebutted that presumption and shown that the current USAO Matrix is the more accurate matrix for estimating the prevailing rates for complex federal litigation in this District"); *DL v. District of Columbia*, 267 F. Supp. 3d 55, 70 (D.D.C. 2017) ("the USAO Matrix ha[s] more indicia of reliability and more accurately represents prevailing market rates" than the *Salazar* Matrix). The USAO contends that the *Salazar* Matrix is fundamentally flawed, does not use the *Salazar* Matrix to determine whether fee awards under fee-shifting statutes are reasonable, and will not consent to pay hourly rates calculated with the methodology on which that matrix is based. The United States recently submitted an appellate brief that further explains the reliability of the USAO Matrix vis-à-vis the *Salazar* matrix. See Br. for the United States as *Amicus Curiae* Supporting Appellees, *DL v. District of Columbia*, No. 18-7004 (D.C. Cir. filed July 20, 2018).